

# Agenda

## Cabinet

**Date**            **Tuesday 4th December 2018**

**Time**            **6.00 p.m.**

**Venue**            **Council Chamber, Newham Town  
Hall, East Ham, E6 2RP**

Rokhsana Fiaz OBE  
Mayor of Newham

Katherine Kerswell  
Interim Chief Executive

Contact: Joy George, Democratic Services Officer, 020 3373 1256

## **CABINET MEMBERS**

(Quorum: 3 - including Mayor or Deputy Mayor)

### **Rokhsana Fiaz OBE, Mayor of Newham– Mayor of Newham**

Councillor Charlene McLean	Deputy Mayor and Cabinet Member, Children & Young People Services, Corporate Parenting and Youth Safety Board
Councillor John Gray	Cabinet Member, Housing Services
Councillor Julianne Marriott	Cabinet Member, Education
Councillor Susan Masters	Cabinet Member for Health and Adult Social Care
Councillor Terence Paul	Cabinet Member, Finance
Councillor Rachel Tripp	Cabinet Member for Environment and Highways

## **LEAD OFFICERS**

Katherine Kerswell	Interim Chief Executive
Grainne Siggins	Executive Director of Strategic Commissioning

## **MEMBERS ARE REMINDED TO SIGN THE ATTENDANCE SHEET**



# **A G E N D A**

The agenda is available online at the link provided and can be printed for anyone requesting a hard copy. A copy of the agenda has been placed for public inspection at Newham Town Hall and Stratford Library.

**1. Apologies for Absence**

**2. Declarations of Interest (Pages 1 - 2)**

In accordance with the Members' Code of Conduct this is the time for Members to declare any interest they may have in any matter being considered at this meeting. Advice is attached.

**3. Minutes (Pages 3 - 18)**

Decisions of the Mayor in consultation with the Cabinet made on 15<sup>th</sup> November 2018.

**4. Appointment to Outside Bodies**

The Mayor to announce any appointments that she has made to Outside Bodies.

**5. The Council's Budget Framework 2019/20 – the Mayor's Initial Revenue Budget proposals and Medium Term Financial Strategy to 2022/23 (Pages 19 - 64)**

**6. Approval of HRA Business Plan (Pages 65 - 80)**

**7. Carpenters Estate Joint Venture Procurement - Update (Pages 81 - 130)**

**8. Newham Local Plan: Adoption (Pages 131 - 514)**

**9. Uniting and supporting Newham schools: the next steps (Pages 515 - 538)**

**10. Developing a Children and Young People's Participation and Engagement Strategy (Pages 539 - 546)**

**11. Council's response to Brexit (Pages 547 - 552)**

**12. Council Performance (Pages 553 - 678)**

**13. Provision of residential placements for Looked After Children as part of a sub-regional block contract across 8 North East London Local Authorities (Pages 679 - 692)**

**14. Expansion of Brampton Manor Academy (Pages 693 - 706)**

15. **Integrated and Independent Mental Health Advocacy (IMHA) Pre-Procurement Report (Pages 707 - 714)**
16. **Treasury Management Mid-Year Report 2018/19 (Pages 715 - 732)**
17. **Small Business Portfolio Review (Pages 733 - 742)**
18. **Civil Traffic Enforcement and Associated Services (Parking Contract) (October 2018 (Pages 743 - 752)**
19. **Proposed procurement of general transport stores requirements for the Supply of Refuse Containers (Steel / Plastic) and Supply of Plastic Refuse Sacks (Pages 753 - 758)**

20. **Local Government Act 1972, as Amended by the Local Government (Access to Information) Act 1985 - Exclusion of Press and Public**

In accordance with Section 100(A)(4) of the Local Government Act 1972, the Committee is asked to resolve that the press and public be excluded from the meeting for specific items of business on the grounds that they may involve the likely disclosure of exempt information as defined in the paragraph of Part I of Schedule 12A to the Act, as amended.

21. **Exempt Appendix for Agenda Item 7 - Carpenters Estate Joint Venture Procurement - Update (Pages 759 - 764)**

This Appendix is exempt by virtue of paragraph 3 of the Access to Information Procedure Rules set out in the Constitution pursuant to schedule 12A Local Government Act 1972, as amended.

22. **Exempt Appendices for Agenda Item 17- Small Business Portfolio Review (Pages 765 - 774)**

These Appendices are exempt by virtue of paragraph 3 of the Access to Information Procedure Rules set out in the Constitution pursuant to schedule 12A Local Government Act 1972, as amended.

23. **Exempt Appendix for Agenda Item 18 - Civil Traffic Enforcement and Associated Services (Parking Contract) (October 2018 (Pages 775 - 780)**

This Appendix is exempt by virtue of paragraph 3 of the Access to Information Procedure Rules set out in the Constitution pursuant to schedule 12A Local Government Act 1972, as amended

## **Members Attendance at Meetings - Statutory Requirements**

Section 85 of the Local Government Act 1972 provides that a Member (Councillor) of an authority must attend a meeting of the authority as a whole (i.e. Council) or a Committee, Sub-Committee or a Joint Committee at least once every six months. Attendance at a meeting of a Committee or Sub-Committee of Council listed below would count in lieu of a meeting of Council provided that the Councillor was an appointed member of that Committee or Sub-Committee

Standards Advisory Committee  
Local or Strategic Development Committee  
Licensing Committee  
Overview and Scrutiny Committee or a Scrutiny Commission  
Investment and Accounts Committee  
Chief Officers Appointment Committee  
Audit Board  
Health & Wellbeing Board  
Corporate Parenting Board  
Standing Advisory Council on Religious Education (SACRE)

Members of the Executive (the Mayor and Cabinet Members) also need to attend a meeting of the Executive i.e. Cabinet at least once every six months.

If you have any queries with regard to this guidance you should contact:

Daniel Fenwick (Monitoring Officer) – 01708 432714  
(E-mail: [daniel.fenwick@oneSource.co.uk](mailto:daniel.fenwick@oneSource.co.uk))

# **The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012**

## **Notice of Intention to Conduct Business in Private**

Notice is hereby given that, in accordance with Regulation 5 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the Agenda Item(s) set out below is/are likely to be considered in private.

The item(s) detailed below will involve the disclosure of exempt information under specific paragraph(s) (detailed below) of the Access to Information Procedure Rules pursuant to Schedule 12A of the Local Government Act 1972, as amended:

Agenda Item No	Title	Reason Exempt
21	Exempt Appendices for Agenda Item 7 - Carpenters Estate Joint Venture Procurement - Update	Grounds: Commercial Information relating to the transaction is exempt by virtue of Category 3 of Rule 11 of the Access to Information Procedure Rules set out in the Constitution pursuant to Schedule 12A Local Government Act 1972, as amended.
22	Exempt Appendices for Agenda Item 17 - Small Business Portfolio Review	Grounds: Commercial Information relating to the transaction is exempt by virtue of Category 3 of Rule 11 of the Access to Information Procedure Rules set out in the Constitution pursuant to Schedule 12A Local Government Act 1972, as amended.
23	Exempt Appendices for Agenda Item 18 - Civil Traffic Enforcement and Associated Services (Parking Contract) (October 2018)	Grounds: Commercial Information relating to the transaction is exempt by virtue of Category 3 of Rule 11 of the Access to Information Procedure Rules set out in the Constitution pursuant to Schedule 12A Local Government Act 1972, as amended.

# **INFORMATION FOR VISITORS**

## **Filming of Proceedings**

Visitors are advised that the Council, Councillors and members of the public may film the meeting and use social media, this is permitted as long as it does not disrupt the meeting. Please therefore be mindful that you could be being filmed for social media or recorded, by entering the meeting you are giving your consent to be filmed. It is requested that any filming by the public and press is focussed on those participating in the meeting.

## **Fire Evacuation Procedure**

A fire alarm test is not expected during this meeting; however if the fire alarm sounds (continuous ringing), staff will direct you to the nearest exit. Please leave in a calm and orderly manner.

Please do not re-enter the building until you are advised it is safe to do so by the relevant member of staff. The assembly point is located in the car park.

## **General Information**

Visitors are advised that this is a meeting held in public and not a public meeting.

There is no opportunity for you to speak or address Elected Members, therefore, you are respectfully requested not to interrupt the meeting.

If you interrupt the meeting and refuse to remain quiet, you will be asked to refrain from doing so and any further interruptions may result in you being asked to leave.

Visitors and Councillors are requested to turn off mobile phones or set them to silent during the meeting.

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## **Members' Declarations of Interest**

### **Matters for Consideration Revised Guidance – February 2016**

The following is offered as a guide to Members. Further details are set out in the Members' Code of Conduct, attached as Part 5.1 of the Council's Constitution.

#### **1. Disclosable Pecuniary Interests**

Disclosable Pecuniary Interests (DPI) are covered in detail in the Localism Act 2011. Breaches of the law relating to these may be a criminal offence.

- 1.1 If you have a DPI in any matter on the agenda you must not participate in any discussion or vote on that matter. If you do so without a prior Dispensation (see below) you may be committing a criminal offence, as well as a Breach of the Code of Conduct. The Council's Constitution requires any Member declaring a DPI to leave the meeting (including any public seating area) during consideration of the matter.
- 1.2 Members will be asked at the start of the meeting if they have any declarations of interest. The Council's Code of Conduct requires you to make a verbal declaration of the fact and nature of any DPI. You are also required to declare any DPIs before the consideration of the matter, or as soon as the interest becomes apparent, if you were not aware of it at the start of the meeting.

#### **2. Non-Disclosable Pecuniary Interest or Non-Pecuniary Interest**

- 2.1 The Council's Code of Conduct requires you to make a verbal declaration of the existence and nature of any "Non-Disclosable Pecuniary Interest or Non-Pecuniary Interest". Any Member who does not declare these interests in any matter when they apply may be in breach of the Code of Conduct.
- 2.2 You may have a "Non-Disclosable Pecuniary Interest or Non-Pecuniary Interest" in an item of business where:
  - 2.2.1 A decision in relation to that business might reasonably be regarded as affecting your well-being or financial standing, or a member of your family, or a person with whom you have a close association with to a greater extent than it would affect the majority of the Council taxpayers, ratepayers or inhabitants of the ward or electoral area for which you have been elected or otherwise of the authority's administrative area, or
  - 2.2.2 It relates to interests which would be a DPI, but in relation to a member of your family or a person with whom you have a close association and that interest is not a DPI. If the matter concerns your spouse, your civil partner or someone you live with in a similar capacity, it is covered by the provisions relating to DPIs.
  - 2.2.3 It could also cover membership of organisations which you have listed on your Register of Interests (including appointments to outside bodies), where there is no well-being or financial benefit accruing to you but where your membership might be said to be relevant to your view of the public interest.
- 2.3 A person with whom you have a close association is someone who is more than an acquaintance, and is someone you are in contact with over a period of time, whether regularly or not. It is someone that a reasonable member of the public might think you would be prepared to favour or disadvantage when discussing a matter which affects them and so covers friends, colleagues, business associates, or someone you know through social contact.

- 2.4 Family should be given a wide meaning. In relation to the family of both you and your partner, it would include the parents, parents-in-law, children and step children, brothers and sisters, grandparents, grandchildren, uncles and aunts, nephews or nieces, together with the partners of any of these persons.
- 2.5 You should make a verbal declaration of any such interest in a matter to be considered at the meeting at the start of the meeting, or before the consideration of the item of business, or as soon as the interest becomes apparent if you are not aware at the start of the meeting of the interest.

### **3. Register of Members interests**

Members are required to complete the Register of Interests and to keep this register up to date by informing the Monitoring Officer in writing within 28 days of becoming aware of any change in respect of their DPIs.

### **4. Dispensations**

In certain circumstances the Monitoring Officer is able to grant a dispensation to you which will enable you either to participate in the discussion on a matter, to vote on the matter, or both. Dispensations can only be granted in limited circumstances. If you believe that you are able to claim a dispensation you must seek advice as soon as possible from the Monitoring Officer, who will consider your request.

The Monitoring Officer, under Section 33(2) of the Localism Act, has granted the following general dispensations to all Members until the Annual Council meeting in 2022, on the grounds that the dispensation is in the interests of the inhabitants of Newham and/or it is appropriate to grant the dispensation to maintain a similar position as applied under the previous code of conduct. This means Members do not need to leave the meeting if their Disclosable Pecuniary Interest arises and is:

- An interest common to the majority of inhabitants in their ward.
- An interest so remote that it is not likely to prejudice their judgement of the public interest.
- Council housing unless related to their own particular tenancy.
- School meals and/or transport unless relating to their own child's school.
- Statutory sick pay for members.
- Members allowances.
- Setting Council Tax or precept.
- Agreeing any Local Council Tax Benefit Scheme.
- Interests arising from membership of an outside body to which the authority has appointed or proposes to appoint them.
- The Local Government Pension Scheme unless relating specifically to their own circumstances.

### **5. Bias and Predetermination**

If in relation to any decision, your outside connections may make it appear to a reasonable person that there is a real danger of bias, or predetermination you should seek advice as to whether it is appropriate for you to participate in any discussion about the matter and in the decision, regardless of whether or not you consider that you should declare an interest as defined above.

For further advice about these matters please contact the Monitoring Officer, Daniel Fenwick on 01708 432714



## CABINET MEETING

**Meeting held on 15th November 2018  
at Council Chamber, Newham Town Hall, East Ham, E6 2RP - Newham Town Hall**

**Present:** Councillor Rokhsana Fiaz OBE (Chair)  
Councillors Charlene McLean, John Gray, Julianne Marriott,  
Susan Masters and Terry Paul

**Other Members Present:** None

**Apologies:** Councillor Rachel Tripp

**The meeting commenced at 6.00 p.m. and closed at 7.25 p.m.**

### **1. Declarations of Interest**

There were no declarations of interest.

### **2. Minutes**

The minutes of the meeting of Cabinet held 15 October 2018 were agreed as a correct record subject to the following amendment:

**Item 3 - Mid-Year Review 2018/19 Budget and Overall Financial Position to 2021/22, recommendation 3 (i) to read:**

**‘Consider a revised strategy in relation to council tax of increasing the core council tax each year at or below inflation, and that further officer planning work for the Medium Term Financial Strategy (MTFS) should assume an average increase of 2% per annum’**

The minutes of the Mayoral Proceedings held 15<sup>th</sup> October 2018 were agreed as a correct record.

### **3. Announcement by the Mayor**

The Mayor informed Cabinet that she had formally appointed Conor McAuley to the Board of Local Space.

### **4. Housing Delivery Statement**

Cabinet received this report setting out the Housing Delivery Statement which detailed how the borough intended to deliver on the Mayor’s vision for housing, focused on engaging residents in decisions about their neighbourhoods; delivering more genuinely affordable homes for local

people; and clearly articulating Newham's values and ways of working to potential partners.

The Mayor introduced the report stating that the Housing Delivery Statement was a vision for housing delivery in Newham which aimed to transform the borough and the lives of residents for the better.

The Mayor said that the Housing Delivery Statement detailed a new approach to housing which understood the housing challenges faced by the borough. The Statement was a clear commitment to put residents at the heart of decision making about their neighbourhoods; deliver genuinely affordable homes and work with partners to meet ambitious pledges.

In response to questions from Members, the Mayor stated that there would be further announcements on major sites including Carpenters Estate and Canning Town and Custom House and she would be happy to meet with local Councillors for those areas.

In response to further questions the Mayor said that the review of under occupied homes would form part of a review of the allocations policy.

The Mayor asked whether the funding granted by the Mayor of London would be sufficient to deliver the pledge to build 1000 new homes. The presenting officer stated that there was much to do but this was a good starting point. The new build programme would go alongside other proposals including the review of the allocations policy and harnessing partnership arrangements to help deliver homes for residents.

**Cabinet agreed to:**

- i. Note the Housing Delivery Statement**
- ii. Note that this is the first part of a wider housing delivery plan, which will be developed into a five year housing strategy**
- iii. Receive regular updates on housing delivery in Newham**

**Alternatives Considered**

Not Applicable

**5. 2018/19 Budget Amendment**

Cabinet received this report which provided an update on the Council's budget for 2018/19.

Cabinet considered a mid-year review of the Council budget on the 15<sup>th</sup> October 2018, which identified a number of pressures and a projected year end overspend of £11.1m. Further work was undertaken to analyse these pressures and identify additional funding streams. The report identified the

adjustments required to the budget to maintain financial sustainability and bring forecast spend back within budget for the current year.

Councillor Paul introduced the report advising that the forecast overspend reported to Cabinet in October had been reduced. He added that following the CIPFA review there were now controls in place for improved governance and financial controls to ensure spend was managed within the revised budget.

In response to questions from Members the presenting officer stated that the report presented a sound budget and the new approach would provide a process whereby projects could deliver the savings identified.

Councillor Paul replied that the financial health check undertaken by the Chartered Institute of Public Finance and Accountancy (CIPFA) would be published shortly.

**Cabinet Agreed:**

- i) the revised budget as detailed in appendix A, including utilising funding available from additional business rates and related section 31 grant receivable in the current year;**
- ii) to provide additional funding to our Children's & Young Peoples service to reflect the current level of pressure on these budgets;**
- iii) to not implement the £5m transfer to the general fund balance, previously agreed at Council in February 2018, thus reducing the projected overspend by that amount;**
- iv) the re-profiled capital programme;**
- v) to note the proposed additional steps to strengthen financial controls and governance arrangements, as set out in paragraphs 4.11 to 4.13 of the report; and**
- vi) To note that Children's services, with direct input from the Interim Chief Executive and the Interim Executive Director of Financial Sustainability are currently drawing up a costed and timed programme to deliver a sustainable, modernised service for subsequent discussion with the Mayor and Cabinet members.**

**Alternatives considered**

Alternatives are to leave budgets as previously approved, although this would not reflect the current pressures that the Council is under or provide a clear basis for managing budgets for the remainder of the current financial year.

**6. Area 7 (Hallsville Quarter) - appropriation of Council land for planning purposes under Section 122 Local Government Act 1972**

Cabinet received this report which requested re-designation of the Council owned land needed for phase 3 of a mixed-use town centre scheme from housing to general planning purposes. The delivery of affordable housing remains a priority for the Council and, in addition to new town centre facilities; this phase of the development would deliver 620 homes of which 199 would be affordable, including some extra care. The re-designation would address potential risks arising from challenges and enable construction of phase 3 of the scheme to proceed in line with the outline planning consent granted in 2012 and s73 permissions granted since.

The Mayor introduced the report advising Cabinet that this would enable construction of phase 3 of the scheme in line with the outline planning consent granted in 2012 prior to the new administration. The development would deliver 620 homes of which 199 would be affordable including extra care rented units for the elderly.

**Cabinet Agreed:**

- (i) that the Area 7 land outlined in red at Appendix 1 is no longer required for the purposes for which it is currently held;**
- (ii) in principle, to appropriate the Area 7 land outlined in red at Appendix 1 for planning purposes under S122 (1) of the Local Government Act 1972.**
- iii) to delegate authority to the Interim Director of Regeneration & Planning, following consultation with the Cabinet Member for Regeneration, Planning and Housing Delivery, to:**
  - a) determine and implement the appropriation**
  - b) agree the timing of the implementation and the detailed terms of related appropriation matters**
  - c) agree the detailed terms of any Deed of Variation that may be required to the PDA**
  - d) deal with any other incidental matters**

Alternatives considered

Detailed in exempt Appendix 2 Supplemental officer report

**7. Plashet Road Development**

Cabinet received this report which sought approval for the Plashet Road

development proposal. Funding for the project was included within the capital programme to be considered as part of the 2018/19 Budget Amendment report set out on the agenda.

The construction phase of the Plashet Road development would include the provision of 55 affordable housing units, a flexible community space and a nursery to accommodate up to 75 childcare placements.

Councillor Gray introduced this report stating that this was a good news story and that the affordability element of the development had been increased. The development would include 27 social homes and 28 shared ownership units.

The Mayor commended the work undertaken on this development.

**Cabinet Agreed:**

- i) To approve the Plashet Road Development scheme Option1, incorporating the development of 55 residential units of which 27 would be owned and funded within the Housing Revenue Account (HRA) at cost and let at social rent values, the remaining 28 units to be sold via Shared Ownership disposal; a Community Centre and Nursery, The Net Present Value (NPV) for Option1 is £2.89M.**

**Alternatives Considered**

1. Do nothing – this is not viable as this would leave a vacant undeveloped area of land vulnerable to vandalism, unauthorised occupation, anti-social behaviour; significant security costs and reputational damage to the Council.
2. Other design options - During the early stages of the scheme several design options were considered. These were discounted in favour of the current design proposals, which successive Project Boards have considered best suits the aspirations of the Council
3. The Council modelled a further two viability options, namely:
  - Option 2  
The low cost home ownership Shared Ownership units being disposed as Shared Equity units, with a resulting £1.12M, NPV;
  - Option 3  
Future New Home purchases 12 units for rented accommodation and the balance remaining as Shared Equity units for sale with a resulting £1.63M, NPV.

The results and comparison of the business plan viability options are shown in the appended Plashet Road Development Appraisal report

## **8. Extending the Grounds Maintenance Service**

Cabinet received this report which sought approval for a variation to the current grounds maintenance contract with Serco Group PLC (“Serco”) to extend it for 6 months from January.

The variation to the contract would allow for a service review and a fully costed review of delivery models to enable a transparent and well-considered decision to be made over the future of the service that would provide best value for the Council and its taxpayers. This was in line with the pledge by the new Administration to review all outsourced contracts and ensure that robust procurement processes were in place in the long term.

Councillor Gray introduced the report on behalf of Councillor Tripp; Councillor Gray stated the variation allowed additional time to achieve the best value for the Council.

The Mayor stated that there would be an announcement shortly on the process for reviewing outsourced services.

### **Cabinet agreed**

- i) A variation of the contract for Grounds Maintenance Services with Serco Group PLC (“Serco”) to extend the duration of the contract for a period of 6 months from 12 January 2019, noting the potential financial implications highlighted in Section 8 and Appendix 1.; and**
- ii) To delegate to the Director of Community & Environment following consultation with the lead Member for Environment and Highways the authority to agree the final terms of the variation but noting that any significant change to the agreement at (i) above must be referred back to Cabinet.**

### **Alternatives considered**

- 1. Ceasing to provide the services at the end of the contract is not a viable practical option for the Council and it would impose significant risk directly onto the Council (risks outlined in paragraph 4.6). The complexity of the current service provision and the staffing and contracting arrangements would bring significant level of risk in terms of contractual performance; legal risk arising from service failing e.g. the duty of care to visitors and the complexities of insourcing of employees on a range of terms and conditions and also the risk that a number of staff would not wish to transfer into the Council. Whilst these issues are surmountable, the poor quality of information currently received from Serco has meant that the level

and nature of the risks are unknown.

2. There is now insufficient time to procure the whole contract for the Services prior to 12 January in compliance with EU rules and allow time to review the current specification and deliver best value for the Council. A purpose of the variation is to allow the Council the time to do so in a compliant manner. This is said in the context of a decision within the variation period of 6 months as to the future long term procurement and delivery of the services.
3. There are frameworks for Grounds Maintenance & Arboriculture services which have been reviewed for their suitability for delivering an interim six month contract whilst the Council carry out a service review and fully costed review of delivery models. However, this is not a suitable option as the same risks that apply to in-sourcing the contract in January would apply to transferring the services and staff to another third party via a framework. These risks to a third party are:
  - a) Insufficient information relating to sub-contractors to identify if they are subject to TUPE.
  - b) Insufficient staff being available on the transfer date if they choose not to TUPE as it can be difficult to recruit into some of the specialist roles.
  - c) Vehicles and equipment cannot be procured by January 2019, requiring more expensive spot hiring from the market, incurring a cost of approximately double that of a pre-agreed lease which would be reflected in the contract price.
  - d) Legal risks arising from the different terms and conditions of TUPE'd staff.
4. Providers would charge a significant extra amount to take on this level of risk, particularly for such a short contract period, and as such best value would not be achieved.
5. The Council could not use a framework without running a mini-competition as none of the existing frameworks cover the full scope of the contract. Running a mini-competition would take an additional 4 – 8 weeks meaning that there would be insufficient time to run the tender, award & standstill period and mobilise.

## **9. Urban Newham Project - Award of Contract**

Cabinet received this report which sought approval to the award of a contract to creative consultants enabling delivery of the Urban Newham Project.

The presenting officer advised Cabinet of minor amendments to paragraph

4.4 of the report which should state that the award of the contract would be subject to both the Call-In procedure and a 10 day standstill period which would end on the 5<sup>th</sup> December 2018.

The Mayor introduced the report stating that the project was a cultural regeneration programme aimed at enhancing the vitality of town centres across the borough. The community would be engaged on the project via various forums and she encouraged ward members to get involved. The Mayor asked that officers brief the relevant ward Councillors.

**Cabinet agreed to:**

- i) Authorise the award of contract to creative consultants AOC Architecture for delivery of the Urban Newham Project;**
- ii) Endorse the Urban Newham Project's community engagement and empowerment through various approaches including via Council's Community Neighbourhoods and Community Assemblies;**
- iii) That officers send a briefing note on the project to the relevant ward Councillors.**

Alternatives considered

The option of using Bloom was considered, however, it was determined that using the recognised and OJEU compliant GLA/TfL ADUP framework would better satisfy the project's broad scope and delivery requirements.

## **10. Integrated Carers Support Service Re-Procurement**

Cabinet received this report which sought approval to undertake a procurement exercise for the provision of a Support Service to provide low level emotional and practical support, via a commissioned Integrated Carers Support Service.

Councillor Masters introduced the reports stating that she could not stress enough the importance of carers, who should receive support.

**Cabinet agreed to:**

- i) approve the procurement of the Support Service for three years (with two one-year extensions) for an annual value of up to £230,000;**
- ii) delegate authority to award the contract, following the procurement, to the Executive Director of Strategic**



**Commissioning in consultation with the Cabinet Member for Health and Adult Social Care; and**

- iii) delegate authority to exercise the extensions, up to a total value over the two-year period of £460,000, to the Executive Director of Strategic Commissioning in consultation with the Cabinet Member for Health and Adult Social Care.**

**Alternatives considered**

The proposed procurement is a joint exercise between Adult Social Care, Children and Young People's Service and Newham Clinical Commissioning Group.

1. The lead-Commissioner has explored a joint-commissioning approach with the Council's neighbouring boroughs; however, they have advised that their preference is to have provider/s with local knowledge and a base in their borough, therefore a joint exercise was not of interest.
2. Consideration has also been given to an in-house team providing the Service. The main limitation is that an in-house team may not be able to reach and support as many Carers as desired, as some Carers, especially Young Carers and Carers of those with certain conditions, are reluctant to approach the Council for support.
3. There are no external business units currently interested in, or suitable to deliver this Service.

**11. Request to Procure Domestic and Sexual Violence Community Services**

Cabinet received this report which sought approval for the re-procurement of the Domestic and Sexual Violence Service contracts which were due to end on the 31<sup>st</sup> May 2019.

Councillor Masters introduced this report and advised Cabinet of two minor amendments to the recommendations as follows:

Recommendation 2.1 to delete the word 'potential' and

Recommendation 2.1 'Agree that the procurement will be undertaken via a restricted tendering procedure complying with the Public Contracts Regulations 2015'

To be replaced with 'Agree that the procurement will be undertaken via an open tendering procedure complying with the Public Contracts Regulations 2015'.

## **Cabinet agreed**

- i) To invite tenders for Domestic and Sexual Violence Services, as outlined in Appendix A, for a contract term of 2 years with the option to extend for up to a maximum of a further two years (1+1) at the sole discretion of the Council;**
- ii) That the procurement would be undertaken via an open tendering procedure complying with the Public Contracts Regulations 2015;**
- iii) That the Executive Director of Strategic Commissioning, in consultation with, the Directors of Finance and Legal and Governance shall award the contract, following a compliant procurement and consultation exercises being undertaken.**
- iv) To delegate authority to the Executive Director of Strategic Commissioning to agree any future extension of the contract, for a period of up to two years, on a 1+1 basis.**

## **Alternatives considered**

- 1. Alternative options for the MOPAC funded element of the service are restricted and must align with MOPAC's Police and Crime Plan priorities. To ensure the model addresses specific concerns of the Newham community the additional LBN contribution and the use of the Public Health Grant enhances the service area to provide outcomes pertinent to the locality; and.
- 2. These services have been commissioned from external providers since MOPAC grant allocation in 2013 ensuring delivery by organisations with an appropriate track record, associated expertise and existing stakeholder relationships. Providers have brought processes and systems to the current contract bid as 'added value'. These include sector specific Customer Relationship Management (CRM) systems allowing us to track outcomes.

## **12. Procurement Above EU Threshold For The Provision of Specialist Financial Advice**

Cabinet received this report which sought approval to award of the Specialist Financial Advice Contract to the bidder providing the most economically advantageous tender.

The award of the contract, following an OJEU tender process would ensure there was specialist advice available as and when required to support the Mayor's programme and enable the Section 151 officer to access specialist advice when required.

The report was introduced by Councillor Paul.

**Cabinet agreed the award of Specialist Financial Advice contract to KPMG for a period of four years with effect from 1<sup>st</sup> December 2018 or as soon as possible thereafter.**

Alternatives considered

1. The specialist advice required for innovative projects is not available internally. The variety of advice – covering taxation, commercial developments, business transformation, pensions, due diligence, technical accounting etc. could not be addressed by the recruitment of staff. Advice is often required on technical or specialist areas e.g. dealing with tax changes on debt funded projects – where specialist advice can reduce the Council or its subsidiaries liabilities.
2. The Council could have arranged its own framework, which would have required a more detailed specification and more officer time – the same consultants are likely to have bid.
3. Tender aimed at SMEs – these would not have the breadth and capacity of the larger accountancy firms. They are likely to be able to provide more conventional support in respect of accountancy and book- keeping. Where support of this type is required, this approach would be more suitable. The tendering process began before the Council focused on community wealth building, and this will be addressed in future tenders for this area of work.

**13. Variation to the scope of a construction contract at Forest Gate School**

Cabinet received this report which recommended the allocation of additional education capital funding to the project to expand Forest Gate Community School by two forms of entry (2FE). The additional funding would improve circulation within the school and outdoor provision for curriculum and recreational use.

The report also sought approval to enter into a development agreement and to delegate agreement of the detailed terms of the construction contract to the Executive Director Strategic Commissioning.

Councillor Marriott introduced the report stating that additional funding was required to make improvements to the exiting design, which had been granted planning permission two months earlier. In response to questions from Members the presenting officer stated that following additional students being admitted to the school the design had been reviewed to increase outdoor space. This would allow for easier movement around the school. Further planning permission would be required for the additional works.

In response to a further question, the presenting officer said that the additional money was government money and any savings would be added back into the schools' capital budget.

**Cabinet agreed:**

- i) **To allocate additional basic need and other schools capital funding to the project, as set out at para 4.5 of the report, subject to the grant of planning permission for the contract variation works;**
- ii) **To vary the contract scope of works as set out at para 4.1 of the report and to vary the construction contract awarded to Neilcott Construction Ltd accordingly with a revised contract sum of £11,829,073, subject to grant of planning permission for the contract variation works.**
- iii) **To enter into a Development Agreement with Community Schools Trust, relating to the delivery of the above contract, including the proposed contract variation, and provision of places at the school as set out at Para 4.6 of the report; and**
- iv) **To authorise the Executive Director Strategic Commissioning, following consultation with the Directors of Asset Management, Financial Sustainability and Legal and Governance, to agree the detailed terms of the contract, subject to the contract being delivered in accordance with a valid planning permission and within the total budget available.**

**Alternatives considered**

Implement current scheme, the school does not consider that this scheme is workable and is only willing to enter a development agreement to provide an additional 1FE as a result

**14. Disposal of 20 Chalkwell Avenue, Westcliffe on Sea, Southend on Sea SS0 8NA**

Cabinet received this report which sought approval for the disposal of 20 Chalkwell Avenue, Westcliff on Sea, Southend on Sea SS0 8NA on the open market to meet the best consideration requirements of the s123 of the Local Government Act 1972. The report therefore sought approval to sell the freehold of the property on the open market.

Councillor Paul introduced the report advising Cabinet that the property was vacant and surplus to requirements. In response to a question from the Mayor the presenting officer said this was an asset previously used as a care home.

## **Cabinet agreed**

- i) The disposal of the freehold interest on the open market;**
- ii) To delegate authority to the Director of Asset Management Services to use an appropriate method of disposal for this transaction to achieve best consideration;**
- iii) To delegate authority to the Director of Asset Management Services to negotiate and agree heads of terms for disposal;**
- iv) To delegate authority to the Director of Asset Management Services to negotiate and enter into an agreement for sale and to conclude the transaction, in consultation with the Director of Legal Services and Governance and the Lead Member for Finance; and**
- v) To note that the property is located outside the London Borough of Newham and the asset is surplus to the Council's requirements.**

## **Alternatives considered**

1. The first option to do nothing has been considered. This is not an option for the Council, as no rental income or capital receipt is being generated from the valuable asset. The vacant property is vulnerable to damage or become a target for squatters. This would result in the Council's inability to sell or let the property.
2. The second option considered was for use as Council temporary housing. Due to the out of borough location this option has been rejected by Housing Services.
3. The third option is to market the asset in the open market for rent to protect it from vandalism, reduce management cost and generate revenue income. The property is in a very poor condition which would require substantial rent free period of up to 5 years to be given to the new tenant. This simply means that the Council would not receive income from the property in the medium term if a tenant was secured for the property. In addition, this would prevent the Council from generating capital receipt in the medium to long term. Selling the property without vacant possession would reduce the Council's ability to generate best value in terms of capital receipt.
4. The fourth option considered was the redevelopment of the site with the benefit of planning permission. Unfortunately, the Deed of Conveyances limits the type of development, number of residential properties and the use of the site that would have adverse impact on the value of the site which would not be the best consideration for the site.

**15. Local Government Act 1972, as Amended by the Local Government (Access to Information) Act 1985 - Exclusion of Press and Public**

Agreed to exclude the press and public from the remainder of the meeting during consideration of the following exempt information.

**16. Exempt Appendix for Agenda Item 6 - Area 7 (Hallsville Quarter) - appropriation of Council land for planning purposes under Section 122 Local Government Act 1972**

The matter was considered but not disclosed during consideration of Agenda Item 6 - Area 7 (Hallsville Quarter) - appropriation of Council land for planning purposes under Section 122 Local Government Act 1972

**17. Exempt Appendices for Agenda Item 8 - Extending the Grounds Maintenance Service**

The matter was considered but not disclosed during consideration of Agenda Item 8 - Extending the Grounds Maintenance Service

**18. Exempt Appendices for Agenda Item 9 - Urban Newham Project - Award of Contract**

The matter was considered but not disclosed during consideration of Agenda Item 9 - Urban Newham Project - Award of Contract.

**19. Exempt Appendix for Agenda Item 11 - Request to Procure Domestic and Sexual Violence Community Services**

The matter was considered but not disclosed during consideration of Agenda Item 11 - Request to Procure Domestic and Sexual Violence Community Service.

**20. Exempt Appendix for Agenda Item 12 - Procurement Above EU Threshold For The Provision of Specialist Financial Advice**

The matter was considered but not disclosed during consideration of Agenda Item 12 - Procurement Above EU Threshold For The Provision of Specialist Financial Advice.

**21. Exempt Appendix for Agenda Item 14 - Proposed Disposal of 20 Chalkwell Avenue, Westcliffe on Sea , Southend on Sea SS0 8NA**

The matter was considered but not disclosed during consideration of Agenda Item 14 - Proposed Disposal of 20 Chalkwell Avenue, Westcliffe on Sea , Southend on Sea SS0 8NA.



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## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	The Council's Budget Framework 2019/20 – the Mayor's Initial Revenue Budget proposals and Medium Term Financial Strategy to 2022/23	
<b>Date of Meeting</b>	<b>4th December 2018</b>	
<b>Lead Officer and contact details</b>	<b>Simon Little, Interim Head of Finance Strategy</b> <b>E: Simon.little@onesource.co.uk</b> <b>T: 020 33737549</b>	
<b>Director, Job title</b>	<b>Mike O'Donnell, Interim Executive Director of Financial Sustainability</b>	
<b>Lead Member</b>	<b>Cllr Terry Paul</b>	
<b>Key Decision?</b>	Yes / No	No decisions on service provision are being made by this report. The report sets out 2019/20 budget proposals as a basis for engagement with residents and other stakeholders, but final decisions will be taken by Cabinet and Council in February.
<b>Exempt information &amp; Grounds</b>	Yes / No	Grounds:
<b>Wards Affected</b>	All	
<b>Appendices (if any)</b>	A. Budget Briefing 29 <sup>th</sup> October 2018 B. Medium Term Financial Strategy C. Proposals for increased spending on priority areas and savings D. Supporting low income households E. Equalities Impact Assessment	

#### 1 Executive Summary

- 1.1 This report outlines the Mayor and Cabinet's revenue budget proposals for 2019/20 as a basis for engagement with residents, stakeholders, partners, staff and their trade union representatives. It also provides the basis for the Overview and Scrutiny Committee and its Budget Working Party to consider the administration's proposals and provide comments on this in advance of decisions being taken at Cabinet on 5<sup>th</sup> February 2019 and Full Council on 18<sup>th</sup> February 2019. The report also sets out the current Medium Term Financial Strategy (MTFS) position and how changes are impacting on the

previously forecast budget gaps up to 2022/23.

- 1.2 The continuation of austerity and ongoing reductions in central government funding for local government, together with rising cost pressures and local growth in demand for services means that the Council continues to face a challenging financial position over the coming years. The report sets out proposals which will ensure that the Council's plans continue to be financially sustainable and enable the delivery of the necessary investment in the Council's priorities over the medium term.
- 1.3 These budget proposals also represent the first significant shift of investment into the administration's priorities; responding to the demands of residents for more investment in social housing, youth services, helping low paid Newham residents, free bulky waste collections, health and social care plans for our vulnerable children, and more investment in Eat for Free school lunches. This is an enabling budget to deliver the administration's priorities in line with manifesto commitments. Over the four years of the Medium Term Financial Strategy further investment will be shifted across into the new priorities.

## **2 Recommendations**

- 2.1 Cabinet, is recommended to agree the proposals set out in this report as a basis for engagement including:
  - 2.1.1 engaging with citizens on the budget proposals, principally through the Citizens' Assemblies, to inform the final budget to be approved by the Council on 18<sup>th</sup> February 2019;
  - 2.1.2 engaging with staff and their trade union representatives;
  - 2.1.3 engaging with other stakeholders including the Newham Clinical Commissioning Group, the Metropolitan Police, East London NHS Foundation Trust, Head teachers and governing bodies of schools in Newham, home care providers, and other partners.
  - 2.1.4 to refer these specific proposals to the Overview and Scrutiny Committee's Budget Working Party for review and comment and continue to engage with their already scheduled programme of meetings leading up to their final report on 14<sup>th</sup> January 2019.
  - 2.1.5 to note that, in terms of the engagement with residents, partners, staff, trade unions and Budget Working Party, that all feedback must recognise that the budget is a finite settlement and any alterations, deductions or additions to the proposals must result in a balanced and deliverable budget that does not worsen the Council's risk profile.
- 2.2 Cabinet, is recommended to note that:
  - 2.2.1 that the date of the Government's Settlement Funding Assessment (SFA) is due by 6<sup>th</sup> December 2018, so the funding position for 2019/20 and the proposals in this report may therefore be liable to change;
  - 2.2.2 that the Government's Fair Funding Review and other potential funding

- changes are ongoing, therefore any MTFS position is based on current funding projections and is liable to change;
- 2.2.3 the impact of any such changes will be incorporated into the final budget proposals for decision by Cabinet on 5<sup>th</sup> February 2019 and Council on 18<sup>th</sup> February 2019.

### **3 Background**

- 3.1 Newham has a large, diverse, young, aspirational population that holds huge potential. It is the most diverse population in the country, with more than 200 dialects spoken.
- 3.2 The population is also one of the fastest growing with the largest population increase within all of the London boroughs between the 2001 and 2011 census (26%). The GLA projects that the population is set to rise to over 350,000 by 2018, and over 360,000 by 2021. The population of Newham is young too. The last Census showed that almost two in five residents are aged under 24, the highest proportion of all London boroughs, and the projected rate of growth of this section of the population over the next three years is above the London average (2.6% compared 2.5% for London overall). The average age in Newham is 31, compared to 40 for the rest of England. While the proportion of residents aged 65 and over is projected to be lower in 2018 than London overall (7.3% compared to 11.7% across London), this is projected to increase at a greater rate than London overall (9.9% by 2021 compared to a 6.2% increase across London).
- 3.3 In addition to this change and diversity, Newham's residents also face significant issues. Around 5100 households are currently housed in temporary accommodation and 28,300 households are on the housing waiting list, a figure that has increased by around 420 per month since April 2018. Newham is one of the most deprived local authorities in the country and although deprivation is falling, Newham remained the 25<sup>th</sup> most deprived borough when the latest Indices of Multiple Deprivation were released (2015).
- 3.4 The report sets out the current MTFS position for 2019/2020 to 2022/2023, and the actions being undertaken to address the forecast budget gaps as set out in the Mid-Year Review Report 2018 presented to Cabinet on 15<sup>th</sup> October 2018 and Full Council on 27<sup>th</sup> October 2018. In addition it also provides an update on the Government's Autumn Budget.
- 3.5 The report also sets out specific proposals for a balanced budget for 2019/20.
- 3.6 The approach which has been adopted for this year includes:
- to reflect the need for improved financial strategy and planning as set out in the report from the Chartered Institute for Public Finance and Accountancy (CIPFA) in response to the Financial Review commissioned by the Mayor;
  - use as a new baseline the reshaped in year 2018/2019 budget as approved by Cabinet on 15 November 2018 to reflect significant in-year financial pressures and undeliverable savings proposals,

- to ensure that the assumptions for 2019/2020 and beyond are rebased to deal with the undeliverable savings from previous years' budgets and provide a sounder basis for financial planning in future years;
  - the need to take account of the ongoing impact of austerity and the resulting savings which need to be made, the local pressures from population change and other demand pressures (particularly in Children and Young People's Services) and the need to reprioritise resourcing to reflect these changes and
  - acknowledging that 2019/2020 is a transitional year with significant steps already being taken to shift priorities and resourcing to reflect the priorities of the Mayor and administration, but recognising that it will take more than one year to achieve this transition.
- 3.7 The report is written at a time where there is little certainty on what local government funding will look like in 2020/21 and beyond. Therefore, the assumptions used over the medium term may be subject to change as Central Government concludes the Fair Funding Review and the proposals in relation to resetting of business rates and start to set out, during 2019, their assessment of funding for 2020/21 and beyond.
- 3.8 The current high level of uncertainty surrounding the Brexit negotiations has created further uncertainty to the funding position going forward as well as significant risk and uncertainty in relation to the wider economic context. The risk profile for all of local government as a major recipient of Central Government funding and business rates is heightened whilst this next six months of resolution of the UK's position is resolved. The ongoing level of risk including risks in relation to funding, staffing and supply chains, mean that robust financial planning and maintaining adequate reserves will be even more critical.

## **4 Considerations & proposals**

- 4.1 This report is the next step in a new approach to the development of financial strategy and the oversight of budgets in Newham, making the process more open and transparent, and builds on the reports to Cabinet on 15<sup>th</sup> October 2018 (Mid-Year Review of the 2018/2019 Budget and Overall Financial Position to 2022/2023) and the further report to Cabinet on 15 November 2018 (2018/19 Budget Amendment).
- 4.2 This report now sets out Cabinet's revenue budget proposals for 2019/2020 as a basis for engagement with citizens, stakeholders, staff and their trade union representatives. It also provides the basis for the Overview and Scrutiny Committee and its Budget Working Party to consider the administration's proposals. The report also sets out the current Medium Term Financial Strategy (MTFS) position and how changes are impacting on the previously forecast budget gaps up to 2022/23. It will be followed by a further report to the Cabinet, for referral to Full Council, in February 2018 to approve the Medium Term Financial Strategy, the 2019/20 Budget and

Council Tax.

- 4.3 The Section 151 Officer is required under the Local Government Act 2003 to sign off a balanced, deliverable and sustainable budget for the following financial year by 11th March.
- 4.4 An initial Equalities Impact Assessment (EqIA) for the 2019/2020 budget proposals to assess any impact of the proposals is included as an appendix to this report. Work on more detailed EqIAs in relation to specific proposals will continue alongside the engagement process and will be informed by it. These will be incorporated into the final decision making reports for Cabinet and full Council in February.
- 4.5 It must be noted that the specific enactment of the budget once decided by Full Council will then, where necessary, take effect through separate decisions by Cabinet and those decisions will be informed by further and more detailed equality impact assessments and formal consultation if required by law.
- 4.6 As part of the Mayor's commitment to a more open and transparent budget process, a programme of engagement with residents, partners, staff, trades unions and other stakeholders will be initiated on the basis of the proposals set out in this report. Alongside this, where there are statutory requirements for consultation on specific proposals, this will also be undertaken in advance of final decisions being taken.

### Central Government Funding

- 4.7 2019/2020 is the final year of the Settlement Funding Assessment (SFA) for local authorities for the four-year period 2016/2017 to 2019/2020. For the period 2016/2017 to 2019/20 the London Borough of Newham faced reductions in its funding amounting to £26.9m or 15.6% (see table 4).

**Table 1: SFA Funding reductions as per 2018/2019 Settlement**

<b>Newham</b>	<b>2016/2017</b>	<b>2017/2018</b>	<b>2018/2019</b>	<b>2019/2020</b>
SFA	£172.7m	£160.4m	£153.6m	£145.8m
Change		(£12.3m)	(£6.8m)	(£7.8m)
<i>Cumulative change</i>			(£19.1m)	(£26.9m)
Change		(7.1)%	(4.2)%	(5.1)%
<i>Cumulative change</i>			(11.1)%	(15.6)%

- 4.8 A breakdown of the SFA into its component parts highlights the reduction in Revenue Support Grant (RSG) and the increasing importance of Business Rates and the London Borough of Newham's level of top-up funding as seen in table 2. The Council is taking part in a Government pilot – a 100% Business Rates Retention Scheme in 2018/2019 and therefore no RSG was

received in this year. If the pilot does not continue into 2019/2020, then the split of the baseline funding will be as shown below. If a second year is agreed, then the split will change although the overall amount of the SFA will be the same.

**Table 2: SFA breakdown**

Provisional Settlement	2013/14 £m	2014/15 £m	2015/16 £m	2016/17 £m	2017/18 £m	2018/19 £m	2019/20 £m
RSG	147.1	119.3	88.1	70.7	56.4	-	36.2
Baseline Funding	97.4	99.3	101.2	102.0	104.0	153.6	110.5
<i>Made up of:</i>							
Retained NNDR	29.5	30.0	30.6	30.8	31.4	75.0	36.1
Top Up	67.9	69.3	70.6	71.2	72.6	78.6	73.5
<b>SFA</b>	<b>244.5</b>	<b>218.5</b>	<b>189.3</b>	<b>172.7</b>	<b>160.4</b>	<b>153.6</b>	<b>145.8</b>

4.9 The London Borough of Newham accepted a four year settlement by Central Government to provide a degree of predictability and stability to the SFA giving greater certainty for financial planning up to and including 2019/2020.

4.10 The acceptance of the offer does not mean that the Council will not potentially gain from funding available where central government policy has changed. However, it is recognised that the Council cannot and should not plan its financial sustainability based on one-off grants from Government

### **The Chancellor's Autumn Budget**

4.11 The Chancellor of the Exchequer, the Right Hon. Philip Hammond MP delivered his third Budget on 29 October 2018. As well as the usual updates on the performance of the economy and the state of the public finances, the Chancellor made a number of financial and policy announcements relating to local government. At this stage, it is too early to confirm what the exact impact on the London Borough of Newham will be and more detail is likely to emerge over time. Where relevant and possible, his announcements have been incorporated into the budget proposals.

4.12 The headlines are summarised below:

- £240 million of new funding was announced for Adult Social Care funding in 2019-20. This is in addition to the £240 million of winter pressures funding announced for 2018/2019;
- a further £410 million will be made available to support both adult and children's social care in 2019/2020.
- the immediate removal of the HRA borrowing cap was confirmed (from 29 October 2018) and the Government estimates an additional 10,000 homes a year will be built, costing the policy at £4.6 billion over 5 years (£1.3 billion a year by 2022/2023);
- £420 million of new funding will be made available across England for pot holes immediately allocated based on the Department for Transport's needs based formula.
- small business retail relief was announced for retail businesses with a

rateable value of less than £51,000 p.a. for two years – this will cost £900 million but the Government has indicated that local government will be “fully compensated”;

- £675 million of co-funding will be awarded to local authorities over the next 5 years to help them draw up plans to revitalise high streets;
- £400 million of capital funding was announced for schools to invest in equipment and facilities in “the little extras” 2018/2019;
- £84 million will be invested over five years to expand programmes for children in care.

4.13 Economic forecasts were adjusted slightly, with the Office of Budget Responsibility forecasting a “relatively stable but unspectacular trajectory for economic growth”. However, the OBR also stated that its forecasts are based on the assumption of a “relatively smooth exit from the EU next year” and that there would be “severe short-term implications” of a “disorderly” exit.

4.14 A copy of the Local Government Association’s briefing on the Government’s autumn budget statement is attached at Appendix A.

### **The Council’s Budget Position**

4.15 The development of the budget proposals for 2019/2020 and future years has been based on the following key elements:

- Demographic increases and resulting additional cost pressures for service delivery
- Central government driven cost pressures;
- Administration priorities;
- Removal of previous budget savings which are undeliverable;
- New savings and efficiency proposals.
- Proposals in relation to taxation
- Increases in specific government grant;
- Treasury and Investment savings;

#### Demographic and government cost pressures

4.16 Some pressures are due to either increasing demographic changes that drive service delivery demands in areas such as social care, or from decisions taken by central government. These costs need to be incorporated into the budget proposals, with savings or funding being found elsewhere to cover such additional costs. See table 3 below for the key assumptions.

**Table 3: Demographic and Government Cost Pressures**

<b>Pressure</b>	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>
Children’s Services	13,378	12,542	12,542	12,542
Adult Social Care	3,015	3,015	3,015	3,015
Pension Auto Enrolment	1,200	1,200	1,200	1,200
Elections	350	350	350	350
<b>Total</b>	<b>17,943</b>	<b>17,107</b>	<b>17,107</b>	<b>17,107</b>

### Administration Priorities

4.17 As indicated above, this budget round is a transitional year in shifting resources to support the priorities of the Council. Further work on more closely aligning priorities and resources will be undertaken as part of the development of the Corporate Plan for the London Borough of Newham. At this stage, five key priorities have been identified to inform the budget and MTFS process. These are set out below:

- **Housing delivery:** tackling the social housing crisis, and stepping up the delivery of genuinely affordable homes for our residents. This will include:
  - Delivering at least 1,000 council-owned homes at social rents over the next four years,
  - Establishing a strategic housing delivery plan, that will join up the Council's approach across land, finance, planning and regeneration; increase the delivery of genuinely affordable homes; and involve people in decisions about their local area.
  - Tackle homelessness with compassion and care, including using innovative approaches to increase the availability of temporary accommodation.
- **Youth Safety / Youth services:** making youth safety a priority, and showing our young people that the Council has their back. This will include:
  - adopting a preventative, public health informed approach to improving youth safety and tackling youth violence;
  - establishing a new youth safety board which will conduct an in depth review of work in this area, involve young people themselves in the Board and help drive forward changes;
  - listening to young people through our youth citizen assemblies, as we seek to improve our youth services;
- **Openness and culture change:** establishing the London Borough of Newham as a model of participatory democracy, by involving our residents in decision making and driving culture change so that the council is open, transparent and accountable. This includes:
  - Establishing a programme of Citizen Assemblies to involve residents in decisions at a neighbourhood level, and ensuring the council is more responsive to residents.
  - Promoting openness and transparency, putting information into the public domain as the default such as regular public Cabinet papers on financial and service performance, open data protocols, and public questions at Council meetings
- **Community Wealth building:** adopting a Community Wealth Building approach, to ensure economic growth in our borough is shared locally and held democratically. This means we will;
  - ensure that council resources are used to achieve maximum social value, and will work in partnership to realise the potential of our



- community; our residents, our businesses, and our voluntary sector.
- review all Council procurement; review our offer on employment and skills; and look at our support for local businesses and charities.
- **Street cleansing and reduction in fly tipping:** this has been identified as one of the key priorities in the first round of Citizens' Assemblies discussions.

4.18 To help deliver these priorities some areas of investment have been identified as set out in the table 4 below.

**Table 4: Manifesto Priorities**

<b>Pressure</b>	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>
Invest in Eat For Free school meals programme	1,247	1,312	1,312	1,312
Invest in a new Schools Partnership	100	200	200	200
Free Bulky Waste Collections	390	390	390	390
Implement London Living Wages for home care staff	3,000	6,000	9,000	12,000
<b>Manifesto priorities</b>	<b>4,737</b>	<b>7,902</b>	<b>10,902</b>	<b>13,902</b>

4.19 Consideration has also been given to a number of areas where further investment is required, however alternative funding has been identified which means that there will be no impact the general fund budget gap or the council tax requirement. These include:

	<b>2019/20</b>
	<b>£000</b>
Ensure housing delivery team is resourced to deliver ambitious programme	500
Investment in youth service	1,400
Programme of Citizen Assemblies to involve residents	250

#### Removal of previous budget savings which are undeliverable

4.20 As part of the development of budget proposals for 2019/20 and beyond, a review of existing budget assumptions has been undertaken, in particular in relation to the deliverability of existing savings initiatives which are currently being reported as undeliverable. Although the Council has generated major savings, with the transformation programme delivering £7m, some of these plans have not been able to be delivered which has generated a shortfall of £7.8m in the base budget.

4.21 Other decisions taken in prior years have proved impossible to deliver in the form, envisioned at the time of approval. These budgets will be deleted and replaced with alternatives to ensure that resources are allocated to deliver the Council's priorities.

**Table 5: Amendment to previous assumptions**

<b>Pressure</b>	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>
Unachievable transformation programme savings	7,800	7,800	7,800	7,800
Transfer of shops from HRA	1,000	1,000	1,000	1,000
Unachievable asset management income generation	1,900	1,900	1,900	1,900
Unachievable Enforcement Income Target	1,000	1,000	1,000	1,000
<b>Change to assumptions</b>	<b>11,700</b>	<b>11,700</b>	<b>11,700</b>	<b>11,700</b>

4.22 Cabinet asked for a review of all the budget lines included in the existing MTFS and a number were identified as no longer necessary, potentially double counting costs or subsumed into the more transparent budgeting process now being undertaken.

**Table 6: Removal of unrequired budget lines**

<b>Mitigation</b>	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>
Savings already delivered during 2018/2019	(1,444)	(1,444)	(1,444)	(1,144)
Provision for skills funding: subsumed into budget	(1,500)	(1,500)	(1,500)	(1,500)
Manifesto priorities: now subsumed into specific budget lines	(500)	(500)	(500)	(500)
One off costs of transformation: provision no longer required as covered by reserves	(3,000)	(3,000)	(3,000)	(3,000)
<b>Unrequired budget lines</b>	<b>(6,444)</b>	<b>(6,444)</b>	<b>(6,444)</b>	<b>(6,444)</b>

#### Proposals in relation to taxation

- 4.23 In the context of significant existing pressures (particularly in relation to Children and Young People's Services and Adult Social Care) and the ongoing reductions in central government funding for central government, consideration has also been given to the option of increasing tax levels in future years.
- 4.24 For these reasons, the current budget proposals incorporate an increase in council tax of 2.9% for 2019/2020 and a planning assumption of increases of 2% per annum thereafter. In addition, as central government funding has failed to keep pace with the increasing adult social care needs in our community, the 2019/2020 budget proposals also incorporate an additional 2% adult social care precept. This is the last year of the Government's current adult social care precept regime,
- 4.25 The budget proposals also incorporate updated assumptions in relation to additional income from an increasing tax base.

**Table 7: Taxation**

	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>
Forecast increase in Funding Base	(1,299)	(2,518)	(3,653)	(4,697)
Business Rates pre fair funding review	(4,870)			
Council Tax at 2.9% 2019/20 followed by 2% each following year	(2,232)	(3,024)	(4,603)	(6,232)
Social Care Precept at 2% 2019/20	(1,492)	(1,532)	(1,579)	(1,629)
<b>Taxation</b>	<b>(9,893)</b>	<b>(7,074)</b>	<b>(9,835)</b>	<b>(12,558)</b>

#### Increases in specific government grant

- 4.26 As set out in the budget briefing, the Chancellor announced some short term funding for both Adult and Children's Social Care, however this does not address the very significant long term issues facing social care. The Council will continue to lobby Central Government to provide a long term, sustainable funding regime for social care.

**Table 8: Short-term Grant Funding**

<b>Mitigation</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>
<b>Additional Grant Funding</b>	<b>(5,500)</b>	-	-	-

#### Treasury and Investment savings

- 4.27 A review of the current capital programme was undertaken and changes agreed as part of the 2019/2020 Budget Amendment report agreed by Cabinet on 15 November 2018. This approach has had the additional benefit of some short term improvements to investment income and reduced borrowing costs. A more substantial strategic review of capital priorities and the development of a new capital strategy will commence shortly with decisions to be taken at the Cabinet meeting on 5<sup>th</sup> February 2019.
- 4.28 The Council is also considering implementing the previously agreed transfer of cash to the Pension Fund, which will reduce the annual cost of employer contributions. The Pension Fund investments generate greater returns due to the greater certainty of cash flows.

**Table 9: Treasury/investment**

<b>Mitigation</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>
Capital costs	(8,010)	(5,905)	303	2,478
Prefunding of Pension Contributions	(500)	(1,800)	(3,600)	
<b>Treasury/Investment Income</b>	<b>(8,510)</b>	<b>(7,705)</b>	<b>(3,297)</b>	<b>2,478</b>

#### Savings and efficiency proposals

- 4.29 Consideration has been given to a number of areas where savings could be made in order to free up resources for other priorities and where increased efficiency and income generation options can also be identified.
- 4.30 Further details of each option are included in Appendix C, and summaries of efficiencies and income generating options are shown in Tables 10 and 11 below.

**Table 10: Savings and efficiency proposals**

<b>Savings proposal</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>
Every Child a Musician savings	(686)	(2,276)	(2,276)	(1,666)
Children's services savings	(3,484)	(5,019)	(5,019)	(5,019)
Enforcement Services savings	(1,400)	(1,400)	(1,400)	(1,400)
Communities & Environment savings	(100)	(100)	(100)	(100)
Publicity Budget efficiencies	(350)	(350)	(350)	(350)
One Source efficiency programme	(487)	(962)	(1,298)	(1,298)
Procurement savings	(750)	(1,444)	(1,444)	(1,444)
Change programme savings	(2,768)	(4,836)	(5,915)	(7,000)
Active Asset Management savings	(400)	(400)	(400)	(400)

Improved financial performance for small business programme	(1,000)	(1,000)	(1,000)	(1,000)
<b>Cost Savings Options</b>	<b>(11,425)</b>	<b>(17,787)</b>	<b>(19,202)</b>	<b>(19,677)</b>

**Table 11: Income generation options**

<b>Mitigation</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>
Fees & Charges Corporate Policy	(1,068)	(2,626)	(3,979)	(5,359)
Small Business Profit Share	(1,000)	(1,000)	(1,000)	(1,000)
Communities & Environment	(750)	(750)	(750)	(750)
Environment & Planning	(500)	(500)	(500)	(500)
Improved Debt management and recovery	(50)	(100)	(150)	(200)
Revised debtor credit balance policy	(500)	(500)	(500)	(500)
<b>Income Generation Options</b>	<b>(3,868)</b>	<b>(5,476)</b>	<b>(6,879)</b>	<b>(8,309)</b>

## **5 Policy Implications & Corporate Priorities**

- 5.1 The budget proposals set out in this paper provide significant new investment in the Council's and residents' priorities. They take account of the views emerging from the first round of Citizens' Assemblies. The proposals also provide for a balanced budget for 2019/2020, together with the outline of a financially sustainable position over the medium term. The proposals will be the subject of further significant engagement with residents, partners, staff, trades unions and other stakeholders and will also be considered by the Overview and Scrutiny Committee's Budget Working Party in advance of final decisions being taken by Cabinet on 5<sup>th</sup> February 2019 and full Council on 18<sup>th</sup> February 2019

## **6 Alternatives considered**

- 6.1 The alternative is to not reflect the administrations priorities or the views of the Citizens Assemblies and leave council budget as they are. This would not reflect the current pressures that the Council is under or provide a clear basis for managing budgets for the remainder of the current financial year.

## **7 Consultation and Engagement**

- 7.1 There is no legal duty to consult on the setting of the budget or council tax, however, this report now sets out Cabinet's initial revenue budget proposals for 2019/20 as a basis for engagement and, where necessary, consultation

with citizens, stakeholders, staff and their trade union representatives. It also provides the basis for the Overview and Scrutiny Committee and its Budget Working Party to consider the administration's proposals. Where the Budget includes decisions to be implemented in 2019/20, where consultation is legally required (either with the public and / or staff and trade unions) this will take place before those final decisions are made.

- 7.2 A separate report elsewhere on the agenda proposed changes to the Council Tax Reduction Scheme and launches consultation on this matter.
- 7.3 The engagement proposed in this report will be guided by the principles of effective financial management as laid down by CIPFA. Feedback will need to reflect that the budget is a finite sum of money and any changes to the proposals be they additions or deletions must result in the budget able to balance and be delivered. The budget proposals must also not result in a worsening risk profile for the Council in the light of the very uncertain future nationally.
- 7.4 **Name of Lead Member consulted:** Cllr Terry Paul  
**Position:** Finance portfolio holder  
**Date:** October 2018

## **8 Implications**

### **8.1 Financial Implications**

- 8.1.1 The financial implications are set out in the body of the report.

### **8.2 Legal Implications**

- 8.2.1 This report is for noting as part of the preparation of the budget and to allow for engagement with residents and others on the proposals. The approval of the budget framework is a matter reserved to Council under the executive arrangements regime in the Local Government Act 2000 and regulations thereunder.
- 8.2.2 No decisions on service provision as being made by this report. There is therefore no duty to consult on the proposals but the Council is informing the public of the Mayor's plans. The public engagement on the draft budget proposals is intended only to inform and engage with the public on the Mayor's intentions. Where specific decisions within the implementation of the budget require consultation with the whole or part of the public, the appropriate consultation exercise will take place before the final decision is made.

### **8.3 Equalities Implications**

- 8.3.1 An Equalities Impact Assessment is included at appendix E.
- 8.3.2 Any equalities implications of decisions taken in any 2018/19 budget reset, the setting of the medium term Financial Strategy and 2019/20

Budget will be evaluated and included in the specific reports be presented in December and February.

- 8.3.3 The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:
- (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
  - (ii) the need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
  - (iii) foster good relations between those who have protected characteristics and those who do not.
- 8.3.4 'Protected characteristics' under the 2010 Act are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity, and gender reassignment
- 8.3.5 In meeting its equalities duties, the Cabinet as the decision maker should have regard to the equalities assessment and information before it. The discharge of the duty cannot be delegated to officers.
- 8.3.6 Due regard means giving proper and focussed consideration of the impact of the decision on meeting its equalities duties. The focus should be on any adverse equalities implications that will arise from a decision and how they can be avoided and / or how they are mitigated in the decisions. The amount of focus on the duties will vary with each decision and how far they adversely impact on protected characteristics.
- 8.3.7 As stated, this report does not make any decision on service provision. An equalities assessment will be carried out for the final budget proposals in February 2019 and this is compliant with the Council's legal duties. Councillors should note that budget decisions on services form only an allocation of funds to a service or area; they do not constitute the final decision on service delivery. Where changes to service delivery are proposed by budgetary changes, a full equalities assessment will be undertaken before the final decision is made by Cabinet. At this stage, formative / initial assessments are sufficient to meet the Council's legal duties.

## **9 Background Information used in the preparation of this report**

- 9.1 The Council's Budget Framework 2018/2019 – Mayor's Revenue Budget Proposals, Medium Term Budget Strategy to 2019/2020 and Council Tax Settings Proposals – approved by Council 22nd February 2018.

- 9.2 Mid-Year Review of the 2018/2019 Budget and Overall Financial Position to 2022/2023 approved by Cabinet 15<sup>th</sup> October 2018 as amended by Full Council on 29 October 2018.



## Appendix A – Budget Briefing 29th October 2018

### Overview:

- Today (29 October 2018), Philip Hammond delivered his Autumn Budget which he billed as a *“Budget for Britain’s future”* and for *“hard-working families”*, claiming that the *“era of austerity is finally coming to an end”*.
- This Budget comes with a significant caveat: it is subject to the outcome of the Brexit negotiations. Over the weekend, the Chancellor was clear in his many media appearances that an emergency Budget will be needed if Britain leaves the EU in March without a deal and that the Spring Statement may be upgraded to a full Budget, if required.
- The Budget included a range of measures including: an extra £500m for Brexit preparations, an end to future PFI deals and an extra £20.5 billion for the NHS over five years.
- Significantly for local authorities it also removed the HRA cap for local authorities with effect from today. The Budget also announced £650 million in grant funding for English local authorities in 2019/2020 and co-funding of £675 million for a Future High Streets Fund to support councils in improving their high streets.
- The Budget was not without its gimmicks, including a 50p commemorative coin to mark Brexit and a new mandatory business rates relief for public toilets, which the Chancellor said was aimed at ensuring that *“local authorities can, at last, relieve themselves”*.
- The LGA have cautiously welcomed the additional money as a “start” but has said that Government needs to reverse the underfunding of local government in the Spending Review.
- The Budget has received criticism by the Labour Party for being full of *“half measures and quick fixes”* and by the Liberal Democrat Party for being a *“sticking plaster”* and both political parties have called for greater investment in public services.
- The one-off, one year £400m “bonus” to help schools to buy *“the little extras they need”* has come under particular fire from a range of educational bodies and teaching unions for failing to understand the funding pressures facing schools.

### Office for Budget Responsibility forecasts

- The OBR has downgraded the 2018 GDP growth forecast to 1.3% from 1.5% in March, due to impact of bad Spring weather
- OBR has upgraded the forecast for GDP growth in 2019 from 1.3% to 1.6%, then 1.4% in 2020 and 2021; 1.5% in 2022; and 1.6% in 2023.
- The OBR predicts 800,000 more jobs by 2023, resulting in over 4.2 million net new jobs since 2010.

## **Appendix A – Budget Briefing 29th October 2018**

- The OBR forecasts sustained real wage growth over next five years.
- The OBR forecasts the deficit will be less than 1.4% next year, falling to just 0.8% by 2023/24.
- Borrowing this year is more than £11.6bn lower than expected at the Spring Statement, at 1.2% of GDP. It is then set to fall from £31.8bn in 2019/2020 to £26.7bn in 2020/2021, £23.8bn in 2021/2022, £20.8bn in 2022/2023 and £19.8bn in 2023/2024.
- The Chancellor said he is predicted to meet his structural borrowing target three years early, with borrowing of 1.3% of GDP in 2020/2021, maintaining £15.4bn headroom.
- The OBR confirms that debt peaked in 2016/2017 at 85.2% of GDP and then falls in every year of the forecast from 83.7% this year; to 74.1% in 2023/2024 - allowing the Government to meet its target to get debt falling three years early.

### **Summary of announcements:**

#### **Brexit**

- An extra £500 million for preparations for leaving the EU.
- A commemorative 50p coin to mark the UK's departure from the EU.

#### **Local Government**

- From today, the Government will lift the Housing Revenue Account (HRA) cap on the amount of money local authorities are able to borrow to build housing.
- A further £650million of grant funding for English local authorities for 2019/2020.
- £45million for the Disabled Facilities Grant in England in 2018/2019.
- £84million over the next five years to expand the Children's Social Care programmes to 20 further councils.
- New mandatory business rates relief for all lavatories made available for public use, whether publicly or privately owned.

#### **Alcohol, tobacco and fuel**

- The cost of a bottle of wine duty to rise by 8p, in line with inflation, in February.
- Tobacco duty will continue to rise by inflation plus 2%
- A packet of 20 cigarettes will go by 33p at 18.00 GMT.
- Fuel duty to be frozen for ninth year in a row.

## **Appendix A – Budget Briefing 29th October 2018**

- Remote Gaming Duty to increase to 21% for online gambling on "games of chance" from 2019. The Chancellor said that this was to account for the loss of revenue as a result of Fixed Odd Betting Terminal (FOBT) stake reduction.

### **Housing**

- Stamp Duty abolished for all first-time buyers of shared ownership properties valued up to £500,000, applied retrospectively to the date of the last Budget.
- A further £500million for the Housing Infrastructure Fund, designed to unlock a further 650,000 homes.
- A new wave of strategic partnerships with nine English Housing Associations to deliver 13,000 homes.
- Up to £1billion of British Business Bank guarantees to support smaller house builders.
- Lift the Housing Revenue Account (HRA) cap on the amount of money local authorities are able to borrow to build housing.
- Lettings Relief to be limited to properties where the owner is in shared occupancy with the tenant from April 2020.

### **High Streets**

- Co-funding totalling £675million for a Future High Streets Fund to support councils in improving their high streets.
- Business rate bills cut by one-third for the next two years for all retailers in England with a rateable value of £51,000 or less, delivering an annual saving of up to £8,000 for up to 90% of all independent shops, pubs, restaurants and cafes.

### **Education**

- A one-off £400m "bonus" to help schools buy "the little extras they need" - a one-off capital payment direct to schools worth an average of £10,000 per primary and £50,000 per secondary

### **Health**

- Confirmation of an extra £20.5bn for the NHS over the next five years
- A minimum extra £2bn a year for mental health services
- The NHS 10-Year Plan will include a new mental health crisis service, with comprehensive mental health support available in every major A&E, children and young peoples' crisis

## **Appendix A – Budget Briefing 29th October 2018**

teams in every part of the country, more mental health ambulances, more "safe havens" in the community and a 24-hour mental health crisis hotline.

- £10m for air ambulances.

### **Transport and infrastructure**

- £420 million is being made available immediately to local highway authorities to tackle potholes, bridge repairs and other minor works in this financial year.
- The National Productivity Investment Fund is to be expanded to over £38billion by 2023/24, so that over the next five years, total public investment is growing 30% to its highest sustained level in 40 years, including spending on roads, railways, research, and digital infrastructure.
- Opening the use of e-passport gates at airports - currently available to people from Europe - to those from the USA, Canada, New Zealand, Australia and Japan
- The Government is abolishing the use of Private Finance Initiative and PFI2 schemes for future projects. A new centre of excellence will manage existing deals "in the taxpayer's interest"

### **Environment and energy**

- A new tax on non-recycled plastic packaging.
- No tax on takeaway coffee cups but the Chancellor said that this will be reconsidered if the industry doesn't make enough progress.
- £60m for planting trees in England.
- £10m to deal with abandoned waste sites.

### **Welfare and taxation**

- £1billion extra over five years to aid transition of Universal Credit and £1.7billion annual extra to smooth taper rates.
- From April 2019, the National Living Wage will rise by 4.9%, from £7.83 to £8.21 an hour.
- Income tax-free personal allowance to rise to £12,500 and higher rate threshold to £50,000 from April 2019, and both to be indexed to inflation from 2021/2022.

### **Defence and policing**

- An extra £160m for counter-terrorism police.
- The Home Secretary will review police spending power and further options for reform when he presents provisional police funding settlement in December.

## **Appendix A – Budget Briefing 29th October 2018**

- An extra £1billion for the Ministry of Defence in the period to the end of next year to boost cyber capabilities and anti-submarine warfare capacity and maintain the pace of the Dreadnought programme.
- £10m for mental health care for veterans, to mark the centenary of World War One Armistice.
- £1.7m in education programmes to mark the 75th anniversary of the liberation of Bergen-Belsen concentration camp, in northern Germany.

### **Business and digital**

- A new digital services tax on UK revenues of big technology companies, from April 2020. Profitable companies with global sales of more than £500m will be eligible.
- A package of measures to stimulate business investment includes an increase in the Annual Investment Allowance from £200,000 to £1 million for two years; targeted relief for the cost of acquiring IP-rich businesses; and a permanent; tax relief for new non-residential structures and buildings.
- Start-Up Loans funding to be extended to 2021, helping 10,000 entrepreneurs. Contribution of smaller firms to apprenticeship levy to be reduced from 10% to 5%.

### **Business taxation:**

- Employment Allowance to be targeted at small and medium businesses with an Employer NICs bill under £100,000 a year from April 2020.
- Entrepreneurs Relief retained, but minimum qualifying period extended from 12 months to two years.
- Threshold for VAT registration to remain unchanged for a further two years. Reforms to IR35 payroll rules to be extended to large and medium-sized firms in the private sector from April 2020.

## Appendix B – Medium Term Financial Strategy

	2019/20	2020/21	2021/22	2022/23
<b>Budget Gap as per MTFS February 2018</b>	<b>10,561</b>	<b>17,804</b>	<b>16,271</b>	<b>14,956</b>

### Pressures

<b>Demographic/Government</b>				
Children's Services	13,378	12,542	12,542	12,542
Adult Social Care	3,015	3,015	3,015	3,015
Pension Auto Enrolment	1,200	1,200	1,200	1,200
Elections	350	350	350	350
<b>Demographic/Government/Democratic</b>	<b>17,943</b>	<b>17,107</b>	<b>17,107</b>	<b>17,107</b>

<b>Council Priority</b>				
Invest in Eat For Free school meals programme	1,247	1,312	1,312	1,312
Invest in a new Schools Partnership	100	200	200	200
Free Bulky Waste Charge	390	390	390	390
Implement London Living Wage for home care staff	3,000	6,000	9,000	12,000
<b>Council Priority</b>	<b>4,737</b>	<b>7,902</b>	<b>10,902</b>	<b>13,902</b>

<b>Previous Decision/Assumption Change</b>				
Unachievable transformation programme savings	7,800	7,800	7,800	7,800
Transfer of shops from HRA	1,000	1,000	1,000	1,000
Unachievable asset management income Generation	1,900	1,900	1,900	1,900
Unachievable enforcement income assumptions	1,000	1,000	1,000	1,000
	<b>11,700</b>	<b>11,700</b>	<b>11,700</b>	<b>11,700</b>
Savings already delivered during 2018/19	(1,444)	(1,444)	(1,444)	(1,444)
Provision for skills funding subsumed into budget	(1,500)	(1,500)	(1,500)	(1,500)
Manifesto priorities now subsumed into specific budget lines	(500)	(500)	(500)	(500)
One off costs of transformation provision no longer required as covered by reserves	(3,000)	(3,000)	(3,000)	(3,000)
<b>Previous Decision/Assumption Change</b>	<b>(6,444)</b>	<b>(6,444)</b>	<b>(6,444)</b>	<b>(6,444)</b>

<b>Potential Revised Budget Gap</b>	<b>38,497</b>	<b>48,069</b>	<b>49,536</b>	<b>51,221</b>
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### Mitigations

<b>Taxation</b>				
Forecast Increase in Funding Base	(1,299)	(2,518)	(3,653)	(4,697)
Business Rates pre fair funding review	(4,870)	-	-	-
Council Tax at 3% each year	(2,232)	(3,024)	(4,603)	(6,232)
Social Care Precept at 2% 2019/20	(1,492)	(1,532)	(1,579)	(1,629)
<b>Taxation</b>	<b>(9,893)</b>	<b>(7,074)</b>	<b>(9,835)</b>	<b>(12,558)</b>

## Appendix B – Medium Term Financial Strategy

<b>Funding</b>				
<b>Funding</b>	<b>(5,500)</b>	<b>-</b>	<b>-</b>	<b>-</b>

<b>Treasury/Investment Income</b>				
Capital costs	(8,010)	(5,905)	303	2,478
Prefunding of Pension Contributions	(500)	(1,800)	(3,600)	-
<b>Treasury/Investment Income</b>	<b>(8,510)</b>	<b>(7,705)</b>	<b>(3,297)</b>	<b>2,478</b>

<b>Cost Savings Options</b>				
Every Child a Musician Savings	(686)	(2,276)	(2,276)	(1,666)
Children's service efficiencies	(3,484)	(5,019)	(5,019)	(5,019)
Enforcement Services savings	(1,400)	(1,400)	(1,400)	(1,400)
Communities & Environment restructure	(100)	(100)	(100)	(100)
Publicity Budget Reductions	(350)	(350)	(350)	(350)
One Source budget efficiencies	(487)	(962)	(1,298)	(1,298)
Procurement Savings	(750)	(1,444)	(1,444)	(1,444)
Change programme savings	(2,768)	(4,836)	(5,915)	(7,000)
Active Asset Management savings	(400)	(400)	(400)	(400)
Improved financial performance for small business programme	(1,000)	(1,000)	(1,000)	(1,000)
<b>Cost Savings Options</b>	<b>(11,425)</b>	<b>(17,787)</b>	<b>(19,202)</b>	<b>(19,677)</b>

<b>Income Generation Options</b>				
Fees & Charges Corporate Policy	(1,369)	(2,626)	(3,979)	(5,359)
Communities & Environment	(750)	(750)	(750)	(750)
Environment & Planning	(500)	(500)	(500)	(500)
Improved Debt management and recovery	(50)	(100)	(150)	(200)
Revised debtor credit balance policy	(500)	(500)	(500)	(500)
<b>Income Generation Options</b>	<b>(3,169)</b>	<b>(4,476)</b>	<b>(5,879)</b>	<b>(7,309)</b>

<b>Total Mitigations</b>	<b>(38,497)</b>	<b>(37,042)</b>	<b>(38,213)</b>	<b>(37,066)</b>
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<b>Potential Revised Budget Gap</b>	<b>-</b>	<b>11,027</b>	<b>11,323</b>	<b>14,155</b>
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## Appendix C – Growth and Savings Options

### 1.1 Children and Young Persons Service (CYPS) & Education

To ensure that Council priorities are delivered and that underfunding of the CYPS is addressed the following areas of growth are incorporated into the MTFS:

#### Growth

	£000
Ongoing pressures not funded in previous years	8,206
Future growth and placing early intervention and prevention at the heart of the service	1,909
Deliver SEND action plan and meet EHCP statutory requirement	3,263
<b>Total</b>	<b>13,378</b>

#### Priorities

- Deliver significant improvements in CYPS through the transformation programme. Accelerate the required improvements in Children's Social care and safeguarding, working with relevant officers so that Newham Council is exemplary in these areas;
- Work with the NHS to deliver high quality, easily accessible and community based, mental health services for all age groups and ethnicities;
- Maintain and enhance family nurse partnership for young mothers;
- Press for health and social care structures in Newham to be based on locally-provided and Newham-based services, which are locally accountable, publicly available and democratically controlled;
- Deliver the SEND action plan and meet EHCP statutory requirements.
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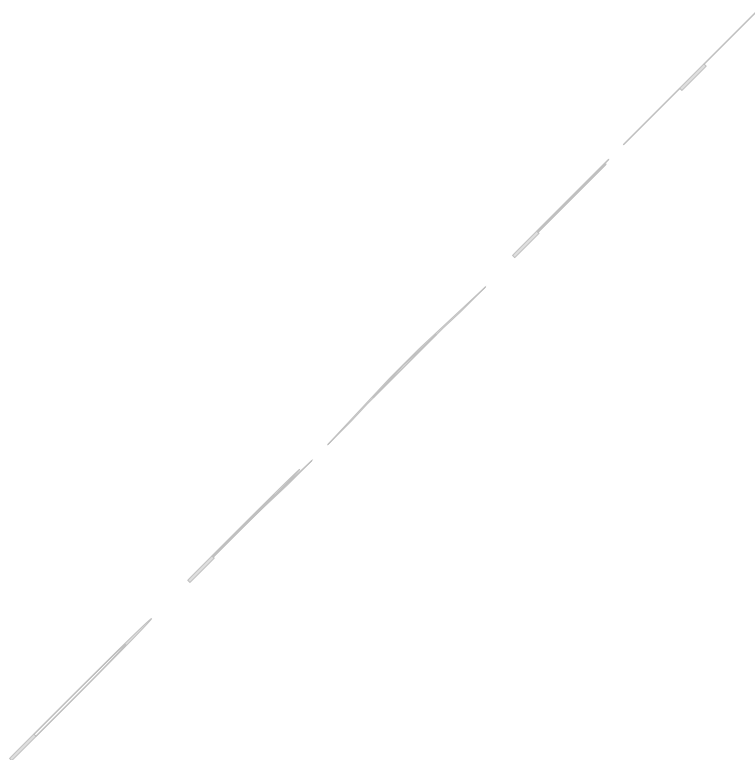
### 1.2 Adult Social Care

Adult Social care continues to face financial pressure:

- Continuing increases in demand especially in mental health and geriatric services;
- Pay inflation in the provider market including National Living Wage and low cost base;
- One of the forms of funding, Adult Social Care Precept, not being implemented by Newham in 2017/18 and 2018/19, reducing or funding by 2019/20 by £3m;
- Independent Living Fund transferred to local authorities, but funded for only three years;
- Complexity of current cohorts becoming frailer with multiple long term conditions.

Although the service continues to make efficiency saving to maintain front line services, there remains a residual pressures of £3m, which only partially offset by the one-off funding for 2019/20 provided by the government announced in the last budget.





## Appendix C – Growth and Savings Options

### 1.3 Pension Auto Enrolment

Every three years all employees, not already members of a pension scheme, are automatically enrolled into the Local Government Pension Scheme (LGPS). The next date for this enrolment in February 2019, previous experience would indicate that around 25% of employees enrolled choose to remain in the scheme, the other 75% choosing to leave.

The total employer's contribution for all of the employees auto-enrolled would be £4.8m, therefore £1.2m has been included in the budget to cover an assumed 25% take-up.

### 1.4 Elections

The Council has elections every four years, rather than take the full cost in just the year of the election, an amount is being set aside into a reserve so that the cost is spread over the four years.

### 1.5 Eat For Free Scheme

The Eat for Free (EFF) scheme provides over 16,000 Key Stage (KS) 2 pupils in Newham schools with access to a nutritional free school meal, saving parents over £440/year per child. Access to healthy and nutritious school meals has wider health benefits for children's health and development, and is crucial in tackling childhood obesity rates as well as instilling healthy eating tendencies for later life. For some children in the most deprived areas of the borough, the well-balanced and nutritious school meal they receive at school could be their only hot meal of the day. School leaders, however, often see the alternative of a packed lunch, as not meeting minimum government nutritional standards and fuels childhood obesity rates. The Director of Public Health in Newham, for example, considers the eating of packed lunches a risk to our most vulnerable families.

The scheme also provides economic benefits to the local economy through an increase in primary school meal uptake rate in schools, which creates additional catering jobs in the borough. Juniper Ventures, a local authority trading company, supplies almost 90% of Newham primary schools and is the fifth largest employer in the borough with 87% of its employees residing in borough. Juniper Ventures' existing business and growth plans are heavily reliant on the revenue Eat for Free generates.

However, families who can afford to pay for school meals, who would be required to pay if they lived in the majority of local authorities throughout the UK, receive a free school meal. Only four local authorities in England offer a universal free school meal scheme at KS 2.

The universal EFF scheme has undergone significant delivery transformation over the last two years to remain operational; including radical changes to the funding model with an additional increase in council funding of £3.7m.

## Appendix C – Growth and Savings Options

The EFF scheme, under its current delivery model, is under significant financial pressure with a predicted budget shortfall of £1.2m in 2019-20. A reduction of around 2.5% per annum to the Local Authority's Public Health Grant may further compound the budget shortfall with a proportional reduction applied to the current £2m budget contribution from Newham Public Health.

The EFF scheme cannot therefore remain within the allocated budget envelope in 2019-20 and requires a decision on the future delivery model if the scheme is to remain within the allocated budget. The cost of maintaining the current universal offer would be £1.247m.

### 1.6 Schools Partnership

The Mayor, in her successful election campaign, pledged to re-establish a sustainable partnership with teachers, governors, parents and pupils to unite the family of Newham schools, and involve them in decisions about education. In July the Executive adopted the policy to support Newham's maintained schools to maintain their current status.

Since this decision, the Cabinet Member for Education and officers have worked closely with schools and other partners to develop proposals; to build on Newham's excellent educational progress and ensure that we work together to provide even better outcomes for all our children and young people. This work has been informed by discussions with governors, parents, young people, elected members and unions.

A number of options are being considered, the maximum contribution from the Council would be £200k for a full year, and the budget assumes a September 2019 start date.

### 1.7 Removal of Bulky Waste Charge

At Full council on the 29th October 2018, a motion was passed to reintroduce a free bulky waste collections. The agreed motion was:

"Council notes that there have been major concerns from residents regarding the scale of fly-tipping in Newham. Council further notes that other local authorities who have removed bulky waste collection charges have subsequently observed a significant decrease in fly-tipping.

This Council therefore resolves to remove the £20 bulky waste collection charge and instead introduce three free collections (of up to six items) for Newham households each year. Council calls upon the Executive to implement this motion."

If up to 3 free collections per year per household were introduced the estimated additional cost for collections is £85,000 and for disposal approximately £45,000 per annum. An income of £260,000 per annum would be lost.

## Appendix C – Growth and Savings Options

### 1.8 London Living Wage

The Council is adopting a Community Wealth Building approach, to ensure economic growth in our borough is shared locally and held democratically. Our new approach means we will ensure that council resources are used to achieve maximum social value, and will work in partnership to realise the potential of our community; our residents, our businesses, and our voluntary sector. This will include looking at council procurement; reviewing our offer on employment and skills; and looking at our support for local businesses and charities.

As of the push for Community Wealth Building, the Council is developing a programme to promote the payment of the London Living Wage (LLW) to all staff providing front line services on behalf of the Council.

### 1.9 Amendment of previous assumptions

The MTFS approved in February 2018 included some assumptions and historic plans for savings or income generation that have proved over optimistic, this MTFS draws a line under these and sets a new approach to delivering efficiencies.

### 1.10 Removal of unrequired budget lines

This MTFS delivers a transparent approach to setting our financial framework for the next four years, as part of this approach there are one-off reduction in the some budget lines, which cover expenditure that has alternative funding or have been subsumed into service budgets.

### 1.11 Taxation

*Business Rates* – although the government has offered a 75% business rates retention scheme in 2019/20, rather than the 100% scheme piloted in 2018/19, there remains a benefit of joining with the other London Boroughs and GLA in pooling business rates.

*Council Tax tax base* – the continued growth in Newham over the last twelve months means that more council tax is collected from these extra households, although it should be recognised that this growth also increases the call upon the services delivered.

*Council Tax and Social Care Precept* - In the context of significant existing pressures (particularly in relation to Children and Young People's Services) and the ongoing reductions in central government funding for central government, consideration has also been given to the option of increasing tax levels in future years.

For these reasons, the current budget proposals incorporate an increase in council tax of 3% for 2019/20 and a planning assumption of increases of 2% per annum thereafter. In addition, as central government funding has failed to keep pace with the increasing adult social care needs in our community, the 2019/20 budget proposals also incorporate an additional 2% adult social care precept. This is the last year of the current adult social care precept regime.

## Appendix C – Growth and Savings Options

### 1.12 Additional One-Off Funding

The Chancellor announced some short term funding for both Adult and Children's Social Care, however this does not address the long term issues facing social care. The Council will continue to lobby central government to provide a long term, sustainable funding regime for social care. This is estimated to be £5.5m.

### 1.13 Treasury and Investment Activity

A review of the current capital programme was also undertaken and changes agreed as part of the 2019/20 Budget Amendment report agreed by Cabinet on 15 November 2018. This approach has had the additional benefit of some short term improvements to investment income and reduced borrowing costs. A more substantial strategic review of capital priorities and the development of a new capital strategy will commence shortly with decisions to be taken at the Cabinet meeting in February 2019.

The Council is also considering implementing the previously agreed transfer of cash to the Pension Fund, which will reduce the annual cost of employer contributions. The Pension Fund investments generating greater returns due to the greater certainty of cash flows.

### 1.14 Every Child .... Programme

A working group has considered four options, all based on achieving a 50% saving from September 2019:

Option 1 – Keep the programme largely 'as is' with reduced services to achieve 50% saving

Option 2 - A menu of evidence based interventions for schools to choose from

Option 3 - Transitional period – 50% saving from September 2019 with some elements of current programme and some new evidence based elements

Option 4 – Enhancement of current enrichment activities in schools, within after school/breakfast clubs, and or during lunch time.

#### **Proposal for consultation**

Proposed aims:

- the primary aim should be to enhance enrichment and participation (rather than attainment).
- the redesigned programme/s should place emphasis on developing children and young people's personal social skills.

A menu of evidence based enrichment activities for schools to choose from, including flexibilities in relation to delivering activities during outside of school hours.

## Appendix C – Growth and Savings Options

Schools would choose from a wider range of more targeted evidence based programmes which could be designed to have greater impact on children's outcomes and wellbeing. The consultation would need to be on the principle of moving to a menu based approach and flexible way of delivering the activities with 50% savings, without giving all the details of the programme.

Examples of what a designed programme might include:

Type of activities:

- Music – pupils may have a wider choice of music instruments. All instruments will be retained by schools. Schools (early years, primary and secondary) could pick and choose which year groups to prioritise for intervention but with significantly lower volume of tuition than now.
- Sports – could be delivered to children and young people from early years to secondary age group.
- Chess – widen the offer within primary and secondary schools
- Theatre – children and young people could be spectating as well as performing (ensuring that it adds value to the current programmes delivered by schools through their in-house resources)
- Coding – could be introduced on a pilot based across primary and secondary schools

## Appendix C – Growth and Savings Options

### 1.15 Children's Services Efficiency Proposals

A recovery action plan aligned to projects has been developed encompassing all aspects of Children's Social Care spend.

Four main themes underpin the recovery action:

- CYPS – Operating Model (Frontline delivery and operational activity;
- Care leavers – Maximising care outcomes (leaving care – post 18);
- Commissioning Activity (all commissioning activity including partnership working and contributions);
- Effective and efficient working – integrated support services (all support and back-office functions, processes and infrastructure).

Projects identifies so far are:

<b>Children Social Care Operating Model</b>	<b>£000</b>
Improvement to prevention (Early Help) to reduce statutory activity	328
Early Intervention	500
More effective commissioning of temporary accommodation for vulnerable families	150
Resign of Health Visiting and School Nursing	613
<b>Maximising Outcomes for Care Leavers</b>	
Maximising utilisation of housing benefit	753
Independent lower cost accommodation	250
Redesign and restructure of service	125
<b>Commissioning Activity</b>	
Redesign of travel assistance service	200
Review Section 17 offer	165
Block contract residential placements	150
Contributions towards services form partners	250
<b>Total</b>	<b>3,484</b>

### 1.16 Enforcement Services

How the Council manages its enforcement services is being reviewed to ensure that it is focussed where it has the greatest impact and delivers what local residents want, whilst doing this savings can be generated of £140,000

- refocussing the Dedicated Ward Officers, reducing the number.
- repurposing the Fly tipping Task Force and Tasking Team to concentrate on street based fly tipping.

## Appendix C – Growth and Savings Options

### 1.17 Communities and Environment

The following income and savings options are included in the MTFS as part of the continuous improvement being pursued within the Communities and Environment Service.

<b>Savings</b>		<b>£000</b>
Business Development and Waste Management	Commissioning Post	<b>100</b>
<b>Income</b>		
Highways & Traffic	Network Management - Income targets to be increased in line with activity	200
Trade Refuse	Commercial Waste Income	200
Fleet Management	Fleet Management	84
Various	Other Incremental Changes	266
<b>Total Income</b>		<b>750</b>

### 1.18 Publicity

The communications team is a centralised function that serves the whole council. It promotes and makes a substantial contribution to achieving the mayoral and corporate priorities.

The communications team is made of a number of different functions and has an overall budget of £3.14million split as follows:

- Events £1.1m
- Newham Mag £436,500
- Marketing, New Media £133,000
- General spend, recharges to other services, salaries £1.4m

The communications team has always ensured that it is not over spent on its budget and this has been achieved through robust procurement processes, looking at efficiencies and consistently innovating to ensure it delivers added value for the council.

In addition, the team seeks to income generate through concession agreements at events, undertaking external design work and managing and attracting film contracts on behalf of the council.

The team is reviewing everything it does at present, the following two savings have been included in the MTFS.

	<b>£000</b>
Reduce publication of Newham Mag to once a month	250
Reduce expenditure or find alternative funding for events	100
<b>Total</b>	<b>350</b>



## Appendix C – Growth and Savings Options

### 1.19 One Source Savings programme

The ongoing efficiency programme being pursued by OneSource should generate the following savings in 2019/20.

	£000
Reduction in support services	50
Process Review and Management and administration	37
<b>Total</b>	<b>487</b>

### 1.20 Procurement savings

A review of all contracts that are due for renewal over the next 24 months is being conducted, a target of an average 2% reduction in cost will generate a savings of £750k in 2019/20.

### 1.21 Modernisation programme

The Modernisation programme aims to put people at the heart of everything we do by; improving the resident experience, building an effective and efficient Council and reducing the cost of service delivery.

Performance improvement and MTFS achievement will be supported by the Modernisation Portfolio and its three work streams and part of the CEO Change Programme

Savings generated from this programme are targeted at:

	2019/20	2020/21	2021/22	2022/23
Modernisation programme savings	(2,768)	(4,836)	(5,915)	(7,000)

### 1.22 Active Asset Management

Previous assumptions on rental income were not robust, the Council has taken the opportunity to review its asset management and take a use a more active technique, including disposing of surplus assets to reduce running costs as well as taking opportunities for maximising rental returns where possible.

A programme is being developed and an initial estimate of reduced costs and extra income of £400k for 2019/20 has been built into the MTFS.

## Appendix C – Growth and Savings Options

### 1.23 Improved financial performance for small business programme

The Localism Act 2011 gave the message to Local Authorities to “be more commercial, become self-financing”. The Council subsequently operated a programme (2012-18) to review services and transition those selected to externalised businesses with the objective of providing more economic, efficient and effective delivery. The Council created 12 Local Authority Trading Companies (LATC’s), which are predominantly wholly owned subsidiaries (Appendix 1) with three exceptions:

- 2x non-profit entities, limited by guarantee (Better Together & ECaM) providing each member with one vote, and
- The Language Shop Limited (the programme’s 1st company) – with a predominantly external client base, it formed an Employee Ownership Trust (EOT) into which the Council transferred 51% equity.

Following cessation of the programme, this project is focused on reviewing the current portfolio structure to:

- identify & introduce portfolio-level efficiency gains (whether legal or structural), and
- determine the Council’s future strategy to ensure continued delivery of an optimal outcome for both the shareholder and residents.

A significant amount of groundwork has already been carried out around an initial review of the portfolio. This project is to crisp-up on the analytical analysis, (harvesting latest financial information, review assumptions & forecasts, cost / benefit analysis), review portfolio structure, investigate corporation tax position with the HMRC, consolidate discussions around a number of associated factors (LLW, LGPS & dividend policy) and gain clarity on the Council’s strategic objectives for the portfolio.

Preliminary analysis of proposed alterations to the portfolio structure through the amalgamation of common services and improved tax efficiency are anticipated to yield a £4.27m NPV improvement over 3 years with a possible **£1m** in year benefit.

### 1.24 Fees & Charges Corporate Policy

A project to review the corporate policy on fees and charges will be undertaken over the next two months, that will seek to ensure a coherent approach to the setting of prices to ensure that there are no inadvertent subsidising within the system. Reducing the amount by which Council tax payers subsidise users of specific chargeable services offered by the Council.

Once the work is completed a clearer picture of the amount that can be generated will emerge, for planning purposes an amount of £1.06m has been assumed.

### 1.25 Environment and Planning

An increase of £500k based on trend analysis has been added to planning income.

## Appendix C – Growth and Savings Options

### 1.26 Debt Management

A cross-service group has been set up to both improve our existing debt management and prevent residents from getting into debt with us. The main areas of review are:

- What the debt is for
- Arrears
- Ageing
- Strategy & policy

Also, looking within the Council:

- What are strengths and weaknesses across the organisation?
- What are opportunities and threats?

An estimate of £50k has been included initially, although as the group works together it is expected that more could be generated.

### 1.27 Revised debtor credit balance policy

The Council holds long term creditor balances where we have been unable to trace the whereabouts of that person or company. Historically this has been held on the balance sheet, but good practice, followed by other Councils, is to bring those balances into the Councils income so that it can be utilised to fund the Council's activity. It is intended that after 3 years, if no claim against the balance is made, it will be brought in as income to the Council.

Trend analysis would suggest that this will be circa £500k per year.

## Appendix D – Supporting low-income households

The council tax reduction (CTR) scheme provides discounts on council tax for low-income households who qualify, and is part of a range of support on offer from the council for residents. Each local authority sets their own approach to CTR, with the London Borough of Newham's current scheme requiring a minimum contribution of 20%,<sup>1</sup> and is expected to cost £18.6m in 2018/2019.

It is important that the right support is in place, both through the CTR scheme and the council's wider offer to low income households. Therefore, a review of the support for low-income households, considering the impact of the government's welfare reforms, the implementation of Universal Credit, and the need to re-design support to be sustainable as government funding reduces will be undertaken. This will include a review of the CTR scheme, with a view to consulting on changes for 2019/2020 and considering plans to reduce the minimum contribution level to 10%. This will cost an additional £2m in the 2019/2020 budget.

The London Borough of Newham also offers these further measures to help low income families

- **Addressing fuel poverty:** the Council is planning to establish a new energy company, 'Beam Energy', which would save an estimated £75-£250 per year for households that switch – helping to address fuel poverty to enable low-income families to manage other costs.
- **MoneyWorks:** the Council's MoneyWorks service provides access to fair, low-cost loans, as well as crisis loans and money management advice – with 5,400 debt and money management sessions hosted since the service was established in 2016. The Council Tax service has also established links with Moneyworks to refer residents in financial difficulty to support, enabling them to agree manageable payment plans with the Council. In the last 8 months, 79 council tax repayment plans were agreed, helping residents to repay £22,828 of council tax debt. We will build on this new offer, and also be looking at how MoneyWorks can identify those at risk of falling into problems earlier.
- **Taking care leavers out of council tax:** Newham care leavers are now exempt from paying council tax in the borough altogether until the age of 25. There are currently 71 care leavers exempt, representing £58,389.73 of support in total.
- **Universal credit and arrears support:** With the introduction of Universal Credit full service in July 2018, support has been made available in our libraries and Community Neighbourhood Centres to help residents to make a claim and access online accounts, and access to additional money management and budgeting advice provided. The Government has announced that they will be cutting funding to local authorities for this support from April 2019, and we will therefore need to consider how we best link up with other providers to support those on UC in the next financial year.
- **Discretionary Housing Payment (DHP):** The Council also administers support with housing costs through DHP, for residents on housing benefit (or the housing costs element of Universal Credit). During 2018/19, the council will spend £1.76m on this support, which can help to reduce the financial strain on low income households in the rented sector and help them to manage other costs, including council tax.

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<sup>1</sup> In 2018/19, this represented a minimum council tax liability of £223.78 for a band C property, compared to a Band C bill of £1,118.91. The average council tax paid by a band C household receiving Council Tax Reduction (CTR) in 2018/19 is £405.38.

## Appendix D – Supporting low-income households

- **Reducing use of bailiffs and court costs:** when people miss their payments, this can result in costly court proceeding being added to their debt, or in cases of serious non-payment significant additional costs from bailiff action. The Council Tax service has introduced additional steps such as text messaging and calls to its collection processes, to encourage early engagement by residents. By keeping our enforcement agents 'in house', following best practice guidance on ethical collections, and linking people with support earlier, the council has significantly reduced enforcement action against those receiving CTR in recent years, with the use of bailiffs having fallen by two thirds since 2014/15. This reduction in enforcement actions has prevented an estimated £900k from being added to residents' debt.<sup>2</sup>

As part of the review, the council will also look at how best to use data to take a single view of people's debt to the council, whether linked to council tax, rent, or other issues, and to intervene earlier and signpost to support where problems may be emerging. By embedding a more holistic and joined-up approach across the council, we hope to intervene earlier and support people in financial difficulties more effectively.

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<sup>2</sup> Enforcement agent action against households receiving CTR has reduced from 2,723 in 2014/15 to 920 in 2017/18.

### Equalities Impact Assessment- Screening on the Budget

#### **1 Introduction**

##### **1.1 The 2019/20 Budget Proposal**

Newham residents frequently tell us that diversity is one of the best things about living in the borough. This also presents challenges in terms of setting a balanced budget which reconciles the needs of Newham's diverse residents: ensuring service availability and equal access, parity in users' experience and creating opportunities for everyone. We recognise the potential for the budget to affect our staff, especially the 42% of employees who are also residents.

In Newham we work to promote equality, diversity and community cohesion, and have set out a clear commitment to putting people at the heart of everything we do. The budget is being developed within the context of acute financial pressures in services supporting vulnerable adults and young people coupled with the rollout of universal credit and welfare reform.

##### **1.2 Purpose of the Equalities Impact Assessment (EqIA) Screening**

The purpose of this Equalities Impact Assessment (EqIA) Screening is to provide an overview of the equalities implications of the budget proposals and to determine aspects of the approved budget that will require further equality analysis, including engagement with staff and residents. The subsequent EqIA on the budget in February will provide a full view to identify individual and cumulative negative impact on any groups with protected characteristics and where adverse impact cannot be eliminated, steps to reduce or reduce adverse impacts by specific policy decisions. Where a small, manageable impact may not be regarded as significant to an individual policy, area or department, the impact can soon become significant when the cumulative impact is considered alongside other policies or savings affecting similar departments. One of the main objectives of this EqIA screening is to anticipate and prevent this from happening by ensuring the Council is able to mitigate accordingly when any group could be adversely impacted.

Each project, policy and specific savings programme will be informed by their own detailed EqIA which will be reported within the full impact assessment of the budget and individually by each service. These assessments will provide residents and staff with the opportunity to shape mitigating actions to alleviate adverse impacts or to achieve additional benefits from positive impacts.

It should be noted that any final assessment of the equalities impact of a specific proposal will be finalised and considered when the decision is considered by Cabinet when implementing this budget. At the stage of approving the budget, no final decision is made on these decisions.

This document will take into account the Borough's key characteristics (refer to section 7 for overview) to identify areas to apply further analysis and evaluation to inform detailed budget preparation. This proactive approach meets the Council's statutory obligations under the, Equality Act (2010) our Public Sector Equality Duty which can be summarised as:

## Appendix E – Equalities Impact Assessment

*(1) A public authority must, in the exercise of its functions, have due regard to the need to—*

- *(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- *(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- *(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it."*

This analysis summarises the key issues and processes that need to be considered in the further development of the Budget with regards to the nine equality strands (protected characteristics as defined by the Equality Act), which are:

- age,
- disability,
- gender,
- ethnicity,
- marriage and civil partnership
- religion or belief,
- transgender,
- pregnancy and maternity and,
- sexual orientation

Newham recognises the interconnected nature (intersectionality) of social groups such as race, gender and socio-economic background in creating overlapping disadvantage. According to the Indices of Deprivation 2015 Newham is ranked 8<sup>th</sup> based on the Rank of the Average rank— therefore Newham is the 8th most deprived local authority in England (based on this measure).and includes class and socio economic background as an equality consideration within impact assessments.

## **2. Summary of Impacts**

The screening ensures that issues highlighted are addressed from all angles in the development of the budget. The review has been carried out to identify the:

- potential negative, neutral and positive impact on different equality groups
- potential negative neutral and positive impact on community cohesion
- potential for cross-cutting and cumulative negative and positive impact.

### **2.1 Potential Cross Cutting Cumulative Impacts**

Newham is a young borough. The Census showed that 38.6% of Newham's population are aged under 24, the highest proportion of all London boroughs. Children and young people are positively impacted by the Mayoral priority to make youth safety a priority, policies include: adopting a preventative, public health informed approach to improving youth safety and tackling youth violence; engaging with young people and; providing youth hubs. Older and disabled people will particularly benefit from an increase in funding for adult social care, partly funded by the 2.9 per cent increase in Council tax. Care workers (81 per cent who are women) potentially benefit from receiving the London Living Wage through an increase in the CAP for care services.

## Appendix E – Equalities Impact Assessment

All residents awaiting low cost housing, particularly those on low income have the potential to benefit from investment in housing and residents will have access to skills and employment opportunities, as the by-product of construction projects and engagement with local businesses.

Policy decisions leading to the redesign of services will need to be mindful of the potential adverse impact upon people who share a protected characteristic.

A summary of all impacts are set out below.

### 2.1.1 Age

#### **Children and Young People**

- Investment in facilities e.g. youth hubs for young people to encourage participation in activities and to reduce the risk of engaging in antisocial behaviour.
- Eat for free- all children in primary school are able to eat a healthy meal at lunch time to support their learning and development. Particularly beneficial to children living within lower income households.
- Reduction in Every Child a Musician (ECAM) funds; potential for reduction in the availability of instruments and tuition for every child within Newham.
- Loss of public health investment: subsequent budget and any changes to services will need to be mindful of the equalities impact on children and young people.
- Review of Best Start in Life to reprovision, but the redesign of services will need to be mindful of the equalities impact for children and particularly children living within families on lower income.

#### **Older People**

- Increase in CAP level for payment for care services- increase from £200.00 to £250:00 per week (in line with neighbouring boroughs-London Borough of Tower Hamlets and Hackney).
- Adult Social Care precept – extra resources for adult social care.

### 2.2 Disabled People

- Increase in CAP level for payment for care services- increase from £200 to £250:00 per week (in line with London Borough of Tower Hamlets and Hackney).
- Increase in council tax payments by 2.9 per cent- disabled people also more likely to receive a 10 per cent council tax reduction to mitigate increase.
- Loss of public health investment- subsequent budget and any changes to services will need to be mindful of the equalities impact on disabled people.
- Adult Social Care precept-extra resources for adult social care.

### 2.3 Gender- Women

- Increase in CAP level for payment for care services- increase from £200 to £250:00 per week (in line with London Borough of Tower Hamlets and Hackney). Older women have a longer life expectancy than men and are therefore more likely to be effected by this policy decision.
- London Living Wage for carers- 81% of care workers in the South East are women.



### 2.4 Pregnancy and Maternity

- Loss of public health investment- subsequent budget and any changes to services will need to be mindful of the equalities impact on pregnant women and women on maternity leave.

### 2.5 Race

- Loss of public health investment- subsequent budget and any changes to services will need to be mindful of the equalities impact on any services targeted at BAME communities.

### 2.6 Sexual Orientation

- Loss of public health investment- subsequent budget and any changes to services will need to be mindful of the equalities impact on LGBT individuals.

### 2.7 Socio-economic

The Public Sector Equality Duty does not require the Council to have due regard for the social-economic impact of proposals. However, the impact on socio-economic groups can demonstrate indirect impact on equality strands, both positive and adverse, e.g. where particular groups are disproportionately represented in socio-economic groups.

- London Living Wage for carers- increase in salary for people on lower income.
- Eat for free- all children in primary school are able to eat a healthy meal at lunch time to support learning and development. Particularly beneficial to children living within lower income households.
- Reduction in Every Child a Musician (ECAM) - reduction in the availability of instruments and lessons for every child within Newham. Future policy decisions to be mindful of children in lower income households who may be unable to access lessons due to tuition fees.
- Loss of public health investment- subsequent budget and any changes to services will need to be mindful of the equalities impact on people on lower incomes.
- Review of Best Start in Life to re-provision - subsequent budget and any changes to services will need to be mindful of the equalities impact on people on lower incomes.
- Increase in council tax payments by 2.9 per cent- people on lower income more likely to receive a 10 per cent council tax reduction to mitigate increase.

## 3. Next Steps

A full Equalities Impact Assessment will be published alongside the final Budget proposals in February 2019. This will involve:

- Engagement with key stakeholders
- Understand extent to which budget reductions are met through efficiency savings e.g. staff reductions and the breadth of any impact on services in terms of hours, quality and outcomes.
- Mitigating actions to alleviate or reduce any adverse impacts
- Consideration of actions to extend the positive impact on individuals and communities

## **4. Supporting Information**

### **Demographics**

#### **4.1 London Borough of Newham's Demographic Composition**

- The 2011 Census data is the most up to date data that is available and so this data has been used to determine the population estimates below.
- The Greater London Authority's (GLA) Housing-led population Projection<sup>3</sup> has been used to determine future population. Please note that all population projections relate to mid-year of the indicated year.
- It shows that the population in Newham is rising and projections from other associations show that it is to continue to rise.
- Newham has a very young and highly diverse population.
- Newham has high levels of population churn compared to London as a whole.
- Newham will benefit from a demographic dividend over the next decade, with high proportions of working age individuals and lower proportions of older and younger dependents.
- In the longer term Newham's working age population will become older, though the overall population profile should still be younger than the national average.
- Newham is a highly deprived borough with especially high rates of deprivation affecting children and older people.
- Poverty in Newham is high and life expectancy is lower than the London average.

From this it can be concluded that Newham faces the following key challenges:

- Retaining educated and entrepreneurial individuals in Newham
- Tackling multiple deprivation and child poverty across the Borough
- Improving health outcomes and raising life expectancy
- Promoting equality and inclusion through accessing opportunities and wealth created from economic development

#### **4.2 Base Assumed Population figure**

The Office for National Statistics (ONS) released the first outputs for Census 2011 on 16th July 2012. The population estimate for Newham is 308,000. At a 64,000 increase since the 2001 Census, this is the largest population increase (26%) within all of the London boroughs. The GLA<sup>4</sup>, project that the population is expected to rise a further 3.9% to 366,943.

According to Census 2011 - ONS estimates, London as a whole has a 2011 population of 8,173,900. Furthermore, based on the same GLA population projection<sup>2</sup> it is projected that the population of London will reach 9,006,352 by mid-year 2018, an

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<sup>3</sup> Greater London Authority's (GLA) Local authority population projections – Housing-led model, this projection is part of the 2016 round of demographic projections.

<sup>4</sup> Greater London Authority's (GLA) Local authority population projections – Housing-led model, this projection is part of the 2016 round of demographic projections.

## Appendix E – Equalities Impact Assessment

increase of 10.2% in comparison to the 2011 Census figure; and by 2021 the population is projected to be 9,298,024, a further rise of 3.2%.

It is important to note that the above GLA population projection and that the exact population of the borough is not a precise science. But by using the proportion of the population as a percentage of the London population, we are able to produce a comparative analysis of the available data.

### 4.3 Equality Strands

#### 4.3.1 Age

Newham is a young borough. The Census showed that 38.6% of Newham's population are aged under 24, the highest proportion of all London boroughs. The average across London was 31.6%. The GLA projects that the population aged 24 and under mid-year 2018 will be 126,128 and this is set to rise by 3,237 in 3 years' time (2018 to 2021) – a percentage increase of 2.6% compared to a percentage increase of 2.5% across London in 3 years' time (2,810,061 to 2,880,741).

The proportion of the population aged 25 years and over in Newham is to increase by a total of 10,459 from mid-year 2018 to mid-year 2021 (227,121 to 237,580). The percentage of Newham's population that will be aged 65 and over by mid-year 2018 is 7.3% compared to 11.7% across London – however this is projected to increase by 9.9% (25,878 to 28,432) by mid-year 2021 compared to a 6.2% increase across London (1,057,444 to 1,123,397).

#### 4.3.2 Children and Young People:

Based on the same GLA projection variant<sup>2</sup> for mid-year 2018, Newham has a slightly higher proportion of residents under the age of 15 (0 to 14 years) than the rest of London 21.6% in Newham compared to 19.5% in London. According to the Census 2011 data, the percentage of dependent children (defined as those residents who are not of working age) in Newham is 25.9% compared to that of 22.6% across London. Newham's percentage is slightly higher than London's due to the high proportion of young people (under 16 years) in the borough.

#### 4.3.3 Disability

According to the 2011 Census, 14% of Newham's population said that they have a disability or long-term illness that limited their day-to-day activities a lot or a little – a drop by 3.5% from the 2001 Census. This compares to 14% in London and 18% in England and Wales.

#### 4.3.4 Ethnicity

In the 2011 Census, 17% of Newham's population described their ethnic group as White British. This ranks the borough as having the smallest percentage of the population in England and Wales being White British – the London average being 45% and the national figure being 81%. People of Indian ethnicity represented 14% of the boroughs population – the largest group after White British.

#### 4.3.5 Gender

## Appendix E – Equalities Impact Assessment

According to the Census 2011 figures, there are 160,300 males in Newham and 147,600 females. Therefore the ratio of males to females is 52:48. Comparatively the ratio for London as a whole is 49:51.

### 4.3.6 Pregnancy and Maternity

In 2017 there were 5,966 live births to mothers whose usual residence was in Newham.<sup>5</sup> The General Fertility Rate (GFR) was 73.4 and the Total Fertility Rate (TFR) 1.96 for women in Newham. In London there were 126,308 births, the GFR was 62.9 and the TFR was 1.70. Newham had the fifth highest GFR and the 9<sup>th</sup> highest TFR across the London Boroughs.

The GFR is the number of live births per 1000 women aged 15 to 44, calculated using mid-year population estimates; and The TFR is the average number of live children that a group of women would bear if they experienced the age specific fertility rates.

It is projected<sup>6</sup>, that there will be 6,200 births in Newham in 2018, decreasing to 6,100 in 2021. London is projected to have 128,800 births in 2018 dropping slightly to 128,500 in 2021.

### 4.3.7 Religion/Belief

In the 2011 Census, 40% of Newham's population identified themselves as Christian – down from 47% in 2001. 32% are Muslim, up from 24% in 2001 – the second highest rate in England and Wales after Tower Hamlets. 9% identified themselves as Hindu and 2% are Sikh. Newham also has the lowest proportion of the population claiming No Religion of only 9.5%.

### 4.3.8 Sexual Orientation and Transgender

Lesbian, Gay, Bisexual and Transgender - There is no comprehensive data source to identify the sexual orientation or proportion of transgender people within Newham's population. The 2011 Census recorded 637 people who stated that they were in a same-sex civil partnership - up by 53 from the 2001 Census.

### 4.3.9 Socio-Economic Disadvantage

Although Newham has a large proportion of working age people in comparison with the rest of London, which is due to increase over the next 20 years, it still is one of the most deprived areas in the country. According to the Indices of Deprivation 2015 Newham is ranked 8<sup>th</sup> based on the Rank of the Average rank – therefore Newham is the 8th most deprived local authority in England (based on this measure). It is worth noting that Newham was ranked 2<sup>nd</sup> based on the same measure in the 2010 Indices of Deprivation. We know that these high rates of deprivation in the borough, along with the high prevalence of people with disabilities and long term health conditions, mean that more people in Newham are reliant on public services than people in other parts of the country. The direct and indirect effects of cuts to public spending when combined with the changes to welfare reform are likely to result in considerable hardship for many residents. This is why Newham has sought to avoid cutting or charging for the frontline services people rely on to meet their day to day

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<sup>5</sup> Office for National Statistics: Births by Area of usual residence of mother extracted using the NOMIS website.

<sup>6</sup> ONS 2016 based subnational population projections: components of change.

## Appendix E – Equalities Impact Assessment

needs. Newham's contribution to freedom passes, and free school meals are examples of this.

The table below, which illustrates the wage disparity between Newham and the rest of London, exemplifies the challenges Newham faces.

Earning by Place of Residence (Earnings of those who live in Newham)			
Gross weekly pay (median)	Newham	London	Great Britain
Full-time worker	£598.80	£670.80	£571.10

Source: Office for National Statistics (ONS) Annual Survey of Hours and Earnings (ASHE) 2018 provisional

Earning by Place of Work (Earnings of those who live outside the borough but work in Newham)			
Gross weekly pay (median)	Newham	London	Great Britain
Full-time worker	£581.80	£713.20	£570.90

Source: Office for National Statistics (ONS) Annual Survey of Hours and Earnings (ASHE) 2018 provisional

### 4.3.10 Homelessness

According to the P1E Quarterly Returns data, 4,892 households were in temporary accommodation at 31<sup>st</sup> March 2018 – ranking Newham 1<sup>st</sup> among the London boroughs.

It is estimated that on any given night 76 people will be rough sleeping in Newham.<sup>7</sup> According to the Combined Homelessness and Information Network' (CHAIN), a database commissioned and funded by the Greater London Authority (GLA) and managed by Broadway Homelessness and Support 418 people were seen rough sleeping in Newham in 2017/18. This represents a 6% increase when compared to 2016/17.

## 4.4 London Borough of Newham Workforce Statistics

Ethnicity	Asian or Asian British	Black or Black British	Chinese or Other Ethnic Group	Mixed	White	Unknown
Amount	1,102	1,126	60	135	1772	501
Percentage	23.5%	24.0%	1.3%	2.9%	37.7%	10.7%

Gender	Male	Female
Amount	1,770	2,926
Percentage	37.7%	62.3%

<sup>7</sup> Rough sleeping in England. Annual rough sleeping counts and estimates statistical release published 16<sup>th</sup> February 2018

## Appendix E – Equalities Impact Assessment

Age Groups	Up to 20	20 to 29	30 to 39	40 to 49	50 to 59	60 and over
Amount	49	517	1,089	1,062	1,508	471
Percentage	1.0%	11.0%	23.2%	22.6%	32.1%	10.0%

Sexual Orientation	Undeclared/ Other	Prefer not to say/Not Specified	Bisexual/Gay man/Gay woman/lesbian	Heterosexual/Straight
Amount	994	877	86	2,739
Percentage	21.2%	18.7%	1.8%	58.3%

Religion/Belief	Amount	Percentage
Agnostic	84	1.8%
Any Other	35	0.7%
Atheist	104	2.2%
Buddhist	20	0.4%
Christian	1,667	35.5%
Hindu	181	3.9%
Jewish	14	0.3%
Muslim	556	11.8%
No religion	184	3.9%
Pagan	6	0.1%
Prefer not to say	421	9.0%
Sikh	101	2.2%
Undeclared	1,323	28.2%

Disability – 233 members (5.0%) of the Newham workforce have a disability.

## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	HRA Business Plan	
<b>Date of Meeting</b>	Tuesday 4 December 2018	
<b>Lead Officer and contact details</b>	<p>Bobby Arthur, Commissioning Leader (Housing Management) Tel: 020 3373 8455 <a href="mailto:bobby.arthur@newham.gov.uk">bobby.arthur@newham.gov.uk</a></p> <p>Benedict Falegan, Finance Business Partner Tel: 020 3373 8343 <a href="mailto:benedict.falegan@newham.gov.uk">benedict.falegan@newham.gov.uk</a></p>	
<b>Director, Job title</b>	<p>Simon Letchford, Director of Commissioning (Communities, Environment, Housing) Tel: 020 3373 4924 <a href="mailto:simon.leitchford@newham.gov.uk">simon.leitchford@newham.gov.uk</a></p>	
<b>Lead Member</b>	<p>Cllr John Gray, Lead Member for Housing Services Rokhsana Fiaz, Mayor of Newham, Lead Member for Regeneration, Planning and Housing Delivery</p>	
<b>Key Decision?</b>	Yes	
<b>Exempt information &amp; Grounds</b>		
<b>Wards Affected</b>	All Wards	
<b>Appendices</b>	<p>Appendix 1 – 5 years estimated revenue Budget and the provisional HRA Capital Programme</p> <p>Appendix 2 – HRA Business Plan assumptions</p> <p>Appendix 3- Modelling Alternatives</p>	

#### 1. Executive Summary

- 1.1. The Mayor has set out a clear ambition for housing in Newham, with a particular focus on increasing social housing stock in the borough. This will require significant Council capital investment to complement the £107m GLA grant under the Building Council Homes for Londoners programme.
- 1.2. The Council has carried out a comprehensive review of the Housing Revenue Account (HRA) Business Plan. This paper summarises the position in order to demonstrate how the HRA development within the Housing Delivery Plan will be funded.

- 1.3. This report is brought to Cabinet in order to increase transparency around Council funding and the opportunities to fund investment in new and existing council homes, supporting Housing Mayoral Priorities as set out in the Housing Delivery statement presented to Cabinet in October 2018

## **2. Recommendation**

- 2.1. For the reasons set out in this report and the appendices, Cabinet is asked to:
- (i) Approve the HRA Business Plan, noting that it is a living document and that it will evolve in line with the developing Housing Delivery Plan
  - (ii) Additionally, Cabinet is asked to give approval for the Council to apply to the Mayor of London's Homebuilding Capacity Fund, to bid for up to £750,000 revenue funding, and to delegate to the Director of Regeneration and Planning to take all necessary actions and decisions to enter into contract for the above funding

## **3. Background**

### **Housing Revenue Account**

- 3.1. The Housing Revenue Account (HRA) reflects the Council's obligation to account separately for authority-owned social housing. The HRA records income (rents, leaseholder charges, etc.) and expenditure, which includes day-to-day management and maintenance, as well as major works, stock improvement and building new social homes. The HRA Business Plan forecasts HRA income and expenditure over the next 30 years.
- 3.2. The HRA Business Plan is a living document and should be formally updated at least once a year, particularly in the light of the opportunities we have through the Housing Delivery Plan and the removal of the cap on borrowing in the HRA.
- 3.3. Until recently Newham HRA debt was capped at £247.6m, with £12m borrowing headroom at the beginning of 2018/19. The limit on HRA borrowing was removed by the government at the end of October 2018. Use of this borrowing freedom is being considered as part of the further development of the Housing Delivery Plan, and where new HRA investment is proposed, this will be tested through future revisions of the Business Plan.

### **Right to Buy receipts**

- 3.4. The Council entered into an agreement with the Government in 2012 to retain an increased proportion of receipts arising from the disposal of HRA properties under the Right to Buy (RTB), providing these proceeds are reinvested into replacement of social or affordable rented housing within three years monitored via quarterly spend targets. RTB receipts can be used to



fund 30% of new property development or acquisition costs; with the balance funded through HRA resources (use of other grant is not allowed).

- 3.5. Currently, Newham has in excess of £60m of Right to Buy receipts and forecasts more than £52m in receipts from further sales over the next 3 years. Receipts that cannot be utilised within the three-year timescale must be paid back to central government with interest. These monies are then ring-fenced by the GLA under a new scheme the Mayor of London introduced in May 2018 and can be drawn down (including interest amount paid) by Newham as grant, which may be used (and match-funded) by the Council inside or outside the HRA. We are currently developing options to use some of the receipts for the new housing properties and temporary accommodation as part of the Housing Delivery statement priorities to build at least 50% of new homes at social rents.

### **Homebuilding Capacity Fund**

- 3.6. The Homebuilding Capacity Fund is a revenue funding programme from the GLA to support Councils to develop the skills, capacity and expertise to deliver new approaches to increasing housing supply.
- 3.7. The funding can be spent on staffing, consultancy support, commissioning studies or providing training for staff. It cannot be spent on:
- Costs that can be capitalised
  - Expenditure which can be funded through other means
  - 'Business as usual expenditure'
  - Expenditure to deliver strategic planning.
- 3.8. The Homebuilding Capacity Fund could be applied to HRA and non-HRA schemes. Councils may bid for up to £750,000, from a total fund of £10 million available over two years, 2019/20 and 2020/21.

## **4. Key Considerations & Proposals**

- 4.1. The HRA business plan has been comprehensively reviewed by the Housing and Finance teams, following significant change in the landscape around Council housing finance including the removal of the cap on borrowing, the GLA's Building Council Homes for Londoners grant programme, and the ring-fencing of RTB receipts. The summary reports are presented at Appendix 1.
- 4.2. The base position outlined in the report presents a balanced business case – i.e. demonstrating full expenditure against received and forecast income. This has been modelled to demonstrate the capacity of the HRA in terms of purchasing new properties, although in practice there may be opportunities or requirements to spend monies in different ways. The business plan can be used to model the impact of investment decisions, and it will be updated to take account stock change, changes of regulation and operational performance.

- 4.3. The assumptions used in the review of the HRA Business Plan is based on a set of key assumptions that are shown at Appendix 2.
- 4.4. Alongside revenue funding for management and repairs, the Business Plan identifies funding for three key areas of capital investment, being:
- a) Capital investment in our existing housing stock
  - b) Funding the HRA element of the Housing Delivery Plan
  - c) Additional supply of affordable housing

**a) Capital Investment in our existing stock (Major Works)**

- 4.5. We are clear that our primary obligation is to ensure that our existing stock is safe and well maintained. Newham has invested considerable sums invested in fire safety works over the last year, including cladding and insulation removal from relevant tower blocks.
- 4.6. The Business Plan allows for £120m investment in major works over the next four years. We have commissioned a rolling stock condition survey of all our council homes; 20% of the stock will be surveyed each year over the next five years. This data will validate our existing assumptions and allow us to plan (in both financial and operational terms) a comprehensive investment and improvement programme.
- 4.7. The first tranche of survey data (expected early 2019) allows us to start this planning process and begin programmes of work. Each cut of data further refines our projections and give us assurance that each and every household receives the investment and improvement work to ensure they are well maintained, warm and safe. We also want to pick up on wider work such as decoration, pathways, and lighting in and around our estates in order to improve liveability and offer an inviting, safe and secure environment.
- 4.8. If the Stock Condition Survey determines the need for works beyond the budgeted level of funding, money can be reallocated from the HRA reserves, which in this base case model, is modelled to show capacity for additional supply of social housing (see section 7 below).
- 4.9. Beyond this term, the business plan allows for £15-25m per year for major works, providing for an ongoing commitment to quality homes.

**b) New build HRA properties in the Housing Delivery Plan**

- 4.10. The Housing Delivery Statement, presented to Cabinet on 15<sup>th</sup> November 2018, outlined the Council's plans to build more than 1000 new social rent homes, and the successful bid for over £107m of GLA affordable housing grant.
- 4.11. The HRA allocation of the Housing Delivery Plan programme is 409 units. These new homes will be funded through £40.9m of the GLA grant, £53m of new HRA borrowing, and £18.6m of HRA reserves.

- 4.12. The review of the HRA Business Plan confirms funding is available for this use.

**c) Additional supply of affordable housing**

- 4.13. The Business Plan review identified that, through full use of existing reserves matched with RTB receipts, 456 new properties (additional to the 409 in the previous section) could be funded up to 2023.
- 4.14. This is included within the HRA BP to demonstrate the total theoretical capacity of the HRA and how it could contribute to the Housing Delivery Plan, however this capacity would be limited by further Major Works required expenditure and the strategic development of the Housing Delivery Plan.
- 4.15. As noted at paragraph 3.8, Newham holds in excess of £60m of Right to Buy receipts following the sale of Council properties to tenants, and that these receipts can fund 30% of the cost of new affordable housing. The review of the Business Plan has identified that LBN could potentially use £54.8m of RTB receipts, match funded by £128m of HRA reserves, to increase supply of social housing.
- 4.16. Assuming this increase comes through acquisition rather than new build (given the already significant new build pipeline); this generates 456 units at a cost of £400,000 per unit. Acquisition activity may include section 106 units.
- 4.17. The use of RTB receipts in this way would leave £47.7m RTB receipts (including forecast future receipts) unused within the timescales prescribed by the Government. The unused receipts and corresponding £6.8m interest must be returned to the government, but will be ring-fenced by the GLA scheme (see para 3.5) and later paid back to the Council as affordable housing grant.
- 4.18. The Tables below provide breakdown of the new build properties and affordable housing supply in the HRA Business Plan and the funding sources.
- 4.19. It is acknowledged that the year-on-year figures below will need to be reprofiled. Acquisition activity within the HRA will be aligned with other acquisition activity within the Housing Delivery Plan.

**Table 1: New Build properties and affordable housing supply**

Year	New build	Acquisitions	Total
2018/19	16	114	130
2019/20	304	80	384
2020/21	89	119	208
2021/22		84	84
2022/23		60	60
Total	409	457	866

**Table 2: Funding sources**

	<b>RTB 1-4-1 receipts</b>	<b>Affordable Housing</b>	<b>Additional borrowing</b>	<b>Other HRA resources</b>	<b>Total</b>
	£'million	£'million	£'million	£'million	£'million
2018/19	13.7	1.6		34.7	<b>50.0</b>
2019/20	9.6	30.4	20.0	55.6	<b>115.6</b>
2020/21	14.3	8.9	41.0	7.9	<b>72.1</b>
2021/22	10.1		8.0	15.4	<b>33.5</b>
2022/23	7.2			16.8	<b>24</b>
Total	54.8	40.9	69.0	130.4	<b>295.1</b>

## **5. Policy implications and Corporate Priorities**

- 5.1. This HRA business plan report confirms the funding for key Corporate priorities in relation to the new HRA units within the Housing Delivery Plan, and major works investment in our existing stock.
- 5.2. The Housing Delivery Plan is being developed over the next 12 months, and the HRA business plan will be used to model various scenarios, such as delivering a higher proportion of Housing Delivery Plan schemes within the HRA, use of RTB receipts, and use of additional HRA borrowing.
- 5.3. The HRA Business Plan is a living document and should be used as a tool to model scenarios and understand the long-term impact of different options to develop our strategic approach.

## **6. Alternatives Considered**

- 6.1. Retaining a larger minimum reserve position has been considered. The base position reported here has a £5m minimum working balance, and retaining a larger reserve would mean more borrowing is required to fund acquisitions. This will form a part of the ongoing strategic development of the HRA's position in the Housing Delivery Plan.
- 6.2. The year-on-year capital investment in existing stock will be re-profiled, whilst retaining the overall spend, due to the pending stock condition survey data that will set out requirements for our investment programmes.
- 6.3. Appendix 3 provides summary of the output of the Base Business Plan and the modelled option.

## **7. Key risks**

- Major works
- 7.1. The figures used in the HRA Business Plan are derived from our asset management system. As noted in the report, a stock condition survey is

underway to update and validate these assumptions. There is a strong likelihood with the absence of an up date stock condition survey that catch up repairs and major works figures in the Business Plan are either stated incorrectly or profiled wrongly. Future changes to Building Regulations in regard to fire safety may lead to increase costs. If repair liabilities or new requirements exceed the existing capital budget, the additional supply programme spend will need to be reduced accordingly.

#### More RTB disposals

- 7.2. Loss of rental income due to decrease in the number of housing stock. This is as a result of RTB disposals. This will most likely be offset by the income from the additional affordable housing supply and new build properties.

#### Affordable housing supply

- 7.3. The Business Plan assumes a significant proportion of RTB receipts will be used for the acquisition of affordable housing properties; however, there may be a shortage in the number of properties available for purchase due to the uncertainty in the wider housing market. Acquisition activity will be aligned with all of the work around Housing Delivery statement and Plan to ensure of the Council maximises all potential opportunities to increase stock, such as acquiring s106 units in private developments.

#### Housing management risks

- 7.4. The HRA Business Plan has been tested for the impact of key assumptions of the Business Plan not turning out as assumed in the plan. If the rents uplift from 2025/26 onwards is CPI plus 0.5% instead of CPI plus 1% assumed in the Business Plan, the HRA revenue reserves at year 30 of the Business Plan will decrease by £189m.
- 7.5. The HRA Business Plan assumes annual efficiency savings of 5% from 2018/19 for four years, however due to the financial pressure within the HRA, this level of savings may be difficult to achieve. If annual efficiency saving in management costs between 2019/20 and 2021/22 is reduced to 3% from the 5% savings assumed in the Business Plan, the reserves position at year 30 will decrease by £76m.
- 7.6. The effect of the welfare reform and the implementation of Universal Credit in Newham from July 2018 may impact significantly on the collection of rents and the level of rent arrears.
- 7.7. Reports will be made to the Council Scrutiny Committee, reporting on the operational performance of the HRA and ongoing risk assessment and mitigation.

#### **Consultation**

Briefing held with Cllr John Gray on 10 July 2018

Briefing held with Cllr Terence Paul on 7 November 2018

## **8. Implications**

### **Financial Implications**

- 8.1. The financial implications are contained in the body of the report
- 8.2. The base business plan presents a balanced position. Minimum level of reserves of £5m is achieved annually within the model.
- 8.3. The Welfare Reform and Work Act introduced the requirement for social landlords to reduce rents on social properties by 1% for 4 years from 2016/17 to 2019/20. The overall impact of 4 years rent reduction on the HRA was £33m. CPI plus 1% rent increase is assumed in the HRA Business Plan for all years from 2020/21.
- 8.4. The removal of the HRA borrowing cap provides the opportunity within the HRA to finance additional new build properties, invest in existing housing properties and increase the use of retained RTB receipts. The costs of financing existing HRA debt and new borrowings are affordable within the Business Plan

### **Legal Implications**

- 8.5. “Under Part V1 of the Local Government and Housing Act 1989 any local authority that owns housing stock is obliged to maintain a Housing Revenue Account. The HRA is a record of revenue expenditure and income relation to an authority’s own housing stock. The items to be credited and debited to the HRA are prescribed by statute. It is a ring fenced account within the authority’s General Fund, which means that local authorities have no general discretion to transfer sums into or out of the HRA.
- 8.6. The Council is required to prepare proposals in January and February each year relating to the income of the authority from rents and other charges, expenditure in respect of repair, maintenance, supervision and management of HRA property and other prescribed matters. The proposals should be made on the best assumptions and estimates available and should be designed to secure that the housing revenue account for the coming year does not show a debit balance. The report sets out information relevant to these considerations prior to the February 2019 Annual finance report to Cabinet.
- 8.7. Section 76 Local Government and Housing Act 1989 places a duty on local housing authorities: (a) to produce, and make available for public inspection, an annual budget for their HRA which avoids a deficit; (b) to review and if necessary, revise that budget from time to time and (c) to take all reasonably practicable steps to avoid an end-of-year deficit. The proposed HRA budget in February 2019 will fulfil these requirements.”

## **Equalities Implications**

- 8.8. An Equalities Impact Assessment has not been completed for this paper, as the HRA Business Plan is presented for information only. Approval for activities relating to funding identified in this paper (e.g. expenditure on new build housing schemes) will be sought on a scheme-by-scheme or programme basis, taking account of the Council's public sector equalities duties.

## **9. Background Information used in the preparation of this report**

- Housing Delivery Statement, LBN Cabinet 15<sup>th</sup> November
- The government's Social Housing Green Paper, August 2018
- The government's Rents for social housing from 2020-21 consultation paper, September 2018

## Appendix 1

**Table - Revenue (5 years)**

<b><u>Housing Revenue Account</u></b>					
<b><u>Five Year Revenue Forecast</u></b>					
	2018/19 £'million forecast	2019/20 £'million forecast	2020/21 £'million forecast	2021/22 £'million forecast	2022/23 £'million forecast
<b>Income</b>					
Rent and service charges	(95.0)	(96.8)	(98.1)	(100.7)	(103.2)
Garages	(1.6)	(1.7)	(1.7)	(1.8)	(1.8)
Commercial rents	(2.6)	(2.7)	(2.8)	(2.8)	(2.9)
PFI grant	(7.3)	(7.3)	(7.3)	(7.3)	(7.3)
Other HRA income	(3.0)	(2.7)	(2.7)	(2.9)	(3.0)
<b>Total income</b>	<b>(109.5)</b>	<b>(111.1)</b>	<b>(112.6)</b>	<b>(115.5)</b>	<b>(118.2)</b>
<b>Expenditure</b>					
Management	31.7	31.5	30.9	30.3	30.0
Repairs & Maintenance	16.8	17.4	17.8	18.1	18.4
PFI unitary payment	16.3	16.9	17.3	17.8	18.4
Other revenue spend	5.8	8.0	6.1	6.3	6.4
Depreciation	23.5	24.1	24.9	25.6	26.2
Capital charges	11.6	11.7	12.5	13.2	13.3
<b>Total expenditure</b>	<b>105.8</b>	<b>109.5</b>	<b>109.5</b>	<b>111.4</b>	<b>112.6</b>
Net expenditure	(3.7)	(1.6)	(3.1)	(4.1)	(5.6)
Revenue contribution to capital expenditure		63.3	3.1	4.4	0.9
Repayment of Debt	0.1	0.6	0.4		0.4
Interest on Balances	(0.8)	(0.4)	(0.3)	(0.3)	(0.2)
<b>Opening HRA reserves</b>	<b>(63.3)</b>	<b>(67.6)</b>	<b>(5.7)</b>	<b>(5.5)</b>	<b>(5.5)</b>
<b>Closing HRA reserves</b>	<b>(67.6)</b>	<b>(5.7)</b>	<b>(5.5)</b>	<b>(5.5)</b>	<b>(10.0)</b>



**Table – Capital (5 years)**

HRA Capital Programme (5 years) **	HRA Business Plan					
	2018/19	2019/20	2020/21	2021/22	2022/23	Total
	£'million	£'million	£'million	£'million	£'million	£'million
	forecast	forecast	forecast	forecast	forecast	forecast
Property acquisitions (New Build)	40.6	27.0	42.6	28.5	19.0	157.7
Property acquisitions (street properties and existing RTB properties)	5.0	5.0	5.0	5.0	5.0	25.0
Fire Safety	20.0					20.0
Major Works (existing properties)	8.3	65.9	27.5	20.5	14.4	136.6
New Build	4.4	83.6	24.5			112.5
Buyback and decants	7.9	1.0	0.2			9.1
Deconversions and Garages	0.2	0.7				0.9
Total	86.4	183.2	99.8	54.0	38.4	461.7

Funding of the HRA Capital Programme						
	HRA Business Plan					
	2018/19	2019/20	2020/21	2020/21	2020/21	Total
Funding						
RTB 1-4-1 receipts	13.7	9.6	14.3	10.1	7.2	54.8
GLA Grant	1.6	30.4	8.9			40.9
Leaseholders contribution to Major Works	2.3	3.6	5.7	5.8	4.7	22.3
Other capital receipts (Newshare repayment of debt)	4.0	1.6	1.6	1.6	1.6	10.4
HRA reserves (including MRR and RCCO)	64.7	118.0	29.3	28.5	24.9	265.4
Additional borrowing headroom		20.0	40.0	8.0		68.0
Total	86.3	183.2	99.8	54.0	38.4	461.7

\*\* 2019/20 to 2022/23 major works costs to be reprofiled. Figures will be based on the Stock Condition Survey.

## Appendix 2 - Assumptions

- 1.1 The total number of dwelling properties in the HRA is 16,137. The types and numbers of properties in the housing stock is shown in the Table below.

Table 1 – breakdown by housing type

Type	No.
Low rise properties	3,228
Medium rise properties	4,999
High rise properties	3,304
Houses	4,605
Shared ownership	1
Total	16,137

- 1.2 The annual inflation assumptions in the Business Plan are shown in Table 2 below:

Table 2 - Inflation		
	RPI	CPI
2019/20	3.4%	2%
2020/21	2.8%	2%
2021/22 onwards	2.9%	2%

Consumer Price Index (CPI) is used in the calculation of rents uplift and RPI for other HRA income and expenditure increases.

- 1.3 The Table provides a summary of estimated average rent and service charges by property type for the dwelling properties.

Table 3 - Average Rents and Service Charges

No. of bedrooms	2019/20 estimated average rents	2019/20 estimated service charges
0	72.47	8.65
1	84.12	10.92
2	95.94	10.10
3	112.69	3.77
4	130.26	0.35
5	142.90	0.15
6	168.71	
7	218.35	

- 1.4 The Welfare Reform and Work Act introduced the requirement for social landlords to reduce rents on social properties by 1% for 4 years from 2016/17 to 2019/20. CPI plus 1% rent increase is assumed in the HRA Business Plan

from 2020/21 onwards, and this has been confirmed by government as applying for 5 years from 2020. The overall impact of 4 years rent reduction on the HRA was £33m.

- 1.5 The PFI properties are exempt from the requirement to reduce rents. An increase of CPI plus 0.5% is assumed for the PFI properties for 2019/20, although this is being reviewed and consulted upon shortly.
- 1.6 Tenants and leaseholders are recharged the costs of providing services to their housing blocks. Service charges are assumed will increase by RPI plus 0.5% annually. However, actual service charges are adjusted to reflect the costs incurred.
- 1.7 The implementation of Universal Credit in 2018 may lead to an increase in the rent arrears. Based on experience elsewhere, it is anticipated that arrears will increase by up to 10% annually. This has been reflected in the HRA Business Plan.
- 1.8 The Business Plan assumes tenants of new build properties will be charged target (formula) rents, although there is a need to address the Council's overall approach to rent policy in the light of the GLA grant funding of £107m for up to 1000 new homes site ready by 2022.
- 1.9 Efficiency savings of 5% is assumed annually on management costs between 2018/19 and 2021/22 and no inflationary increase applied. Annual RPI uplift assumed from 2022/23 onwards.
- 1.10 Annual RPI increase is factored into the Business Plan for the Repairs and Maintenance budget.
- 1.11 RPI is used for the annual uplift of PFI payments. Variation in the PFI payments above the RPI increase will be funded from the earmarked PFI reserves.
- 1.12 The estimated interest on reserves for 2018/19 is £787,000. This will reduce significantly by 2020/21 due to the increase in the funding requirements for the HRA Capital Programme.
- 1.13 The HRA minimum working balance in the Business Plan is £5m. The HRA reserves in the Business Plan are at minimum level in most years between 2019/20 and 2028/29.
- 1.14 The HRA Business Plan allocates resources from revenue and revenue reserves to fund the HRA Capital programme. It is anticipated that circa £71m of HRA capital projects will be funded from the HRA reserves over the next five years.
- 1.15 The HRA CFR (borrowings) will decrease annually due to the repayment of the PFI borrowings. The £37.5m PFI debt will be fully repaid in 2035/36.

- 1.16 The HRA borrowing cap has been scrapped from 31<sup>st</sup> October 2018. New borrowing will be permitted for expenditure on new build properties and capital expenditure on existing properties. The impacts overall of this change are being modelled to support increased housing supply.
- 1.17 The interest on existing debt is estimated to cost the HRA around £12m in 2018/19. Interest will increase to £13m after the additional £68m borrowings assumed in the HRA Business Plan. The HRA can afford the extra interest payment from the additional borrowing.

## Appendix 3

### Appendix 3 - Modelling alternatives

	Revenue Reserve s year 5	Revenue Reserves year 10	Revenue Reserves year 30	Shortfall in the funding of capital programme	New build properties first five years (to 2022/23)	Additional housing supply (units to 2022/23)	Recycled or returned receipts
	£million	£million	£million	£million			
Base Business Plan	9.8	5.1	640.3		409	456	54.5
Option 1 - increase the HRA reserves minimum balance from £5m to £20m	24.8	20.2	656.8	15.5	409	456	54.5

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## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	Carpenters Estate Joint Venture Procurement – Update	
<b>Date of Meeting</b>	Tuesday 4 <sup>th</sup> December 2018	
<b>Lead Officer and contact details</b>	Joanne Stevens, Senior Regeneration Area Manager Tel:020 3733 2690 Email: joanne.stevens@newham.gov.uk	
<b>Director, Job title</b>	Elaine Elkington, Interim Director of Regeneration and Planning	
<b>Lead Member</b>	Rokhsana Fiaz (Mayor)	
<b>Key Decision?</b>	Yes	Reasons: Over £500,000
<b>Exempt information &amp; Grounds</b>	Yes	Grounds: Commercial Information relating to the transaction is exempt by virtue of Category 3 of Rule 11 of the Access to Information Procedure Rules set out in the Constitution pursuant to Schedule 12A Local Government Act 1972, as amended.
<b>Wards Affected</b>	Stratford and New Town	
<b>Appendices (if any)</b>	Appendix A: Carpenters Estate Map Appendix B: EXEMPT Financial impact of 50 percent social rented housing on the Carpenters Estate dual Joint Venture delivery model Appendix C: Carpenters Estate Decant Update Appendix D: Equalities Impact Assessment	

#### 1 Executive Summary

- 1.1 The Council is committed to putting people at the heart of everything it does, enabling Newham residents to play a key role in shaping the borough and building better neighbourhoods that work for everyone.
- 1.2 Through Citizens' Assemblies, residents have identified housing for local people as a key issue. It is also a top priority for the Council. Mayor Fiaz has pledged to deliver 50 percent of all homes on Newham owned land as genuinely affordable and at social rent levels, including those to be provided at Carpenters Estate.
- 1.3 The Council commenced a procurement in August 2017, under the previous administration, to seek a Joint Venture partner for the comprehensive redevelopment of Carpenters Estate; and to also hold and manage a portion

of the developed homes for income generation (a dual development and asset holding Joint Venture).

- 1.4 Mayor Fiaz pledged to review this decision and to prioritise the delivery of the largest proportion of social rented Council homes at Carpenters Estate that is possible, aiming for a minimum of 50 percent.
- 1.5 Officers have reviewed the potential for the current dual Joint Venture procurement to deliver this ambition and to realise other key strategic objectives of the new administration, including:
  - the engagement of residents on vision, design, procurement and delivery from the outset of estate regeneration projects to ensure that proposals are supported and championed by the community, in line with the principles of the Mayor of London's Good Practice Guide to Estate Regeneration
  - the Council leading on and controlling the quality, scale and pace of housing delivery on Newham owned land.
- 1.6 The review concludes that on balance, delivery of this administration's key strategic objectives would be restricted by the scope and contractual parameters of the current dual Joint Venture procurement, as set out in the OJEU Concession Notice and Memorandum of Information published on 22<sup>nd</sup> August 2017 and the Corrigendum published on 17<sup>th</sup> October 2017. The reasons for this are set out further in this report and its appendices.
- 1.7 The primary recommendations are therefore to cease the current dual Joint Venture procurement and to engage further with residents to define a route for the delivery of more homes at Carpenters Estate, aiming for a minimum of 50 percent at genuinely affordable and social rent levels, and to create a strong and sustainable neighbourhood in a way that is financially viable for the Council.

## **2 Recommendations**

- 2.1 For the reasons set out in the report and its appendices, Cabinet is recommended to agree:
  - 2.1.1 That the Council develops and implements a programme of consultation and engagement, to inform the Carpenters Estate regeneration options review at recommendation 2.1.2
  - 2.1.2 That the Council undertakes a review of regeneration options for Carpenters Estate (including meanwhile uses) to identify the optimum route to deliver the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent; the review to be undertaken utilising existing capital funding approvals.



- 2.1.3 To continue the decant programme in decant phases 1 and 2, as activated in accordance with recommendation iii) of the 15<sup>th</sup> December 2016 Cabinet Report under delegated authority utilising existing capital funding.
- 2.1.4 To cease the current OJEU procurement for a Joint Venture partner/s for the redevelopment of Carpenters Estate, as commenced on 14<sup>th</sup> August 2017.

### **3 Background**

- 3.1 The existing Carpenters Estate was built between 1968-1972 on a 23 acre site adjacent to Stratford station. There are 710 homes: 434 in three tower blocks and 276 in low rise blocks or terraced housing. The site also includes a community centre (rented and managed by a third party as the Carpenters and Docklands Centre); a 2 Form Entry primary school; a pub; some light industrial commercial units; a local housing office (formerly a GP surgery and then a Tenant Management Organisation office until 2015) and a convenience store. A map of the estate is shown at Appendix A.
- 3.2 The Building Crafts College is also located on the estate. The building and land it occupies is owned by The Worshipful Company of Carpenters (WCC), a livery company. The WCC are also the freehold owner of two further parcels of land at Gibbins Road which hosts overspill activity from the Building Crafts College together with B1 (business and light industry) uses let to third parties.

#### *Historic regeneration proposals*

- 3.3 From 2005 to 2010, regeneration proposals focused predominantly on the demolition of the tower blocks and some central low rise blocks, to be replaced with alternative housing.
- 3.4 Following Cabinet approval of the Stratford Metropolitan Masterplan in 2010, proposals have focused on the comprehensive redevelopment (demolition and rebuild) of the whole estate. Discussions were entered into with UCL regarding the location of a new east campus at Carpenters Estate but negotiations came to an end without agreement in Spring 2013.
- 3.5 In November 2015 Cabinet agreed the principle of a joint venture delivery approach and in December 2016, Cabinet approval was given to commence the procurement of a Joint Venture partner for the redevelopment, asset holding and management of Carpenters Estate. The procurement has been paused since April 2018, fairly early in the process, without significant development of proposals for the estate.

## **4 Key Considerations & Proposals**

### *Bringing forward positive change at Carpenters Estate*

- 4.1 There have been several false starts to redevelopment at Carpenters Estate and residents have had to endure more than a decade of uncertainty with regard to plans for their homes. Increasingly, this has led to a degree of mistrust about the Council's ability or willingness to recognise and respond to resident needs.
- 4.2 This Council acknowledges the need to effect positive change now at Carpenters Estate, prioritising residents and involving them directly in the evolution of ambitious and deliverable plans for the neighbourhood.
- 4.3 It is necessary now to make progress at pace. The intent is to review options to accelerate the delivery of new homes whilst ensuring that the estate is managed and maintained to a good standard throughout the regeneration process.
- 4.4 The regeneration options review, guided by the Mayors Manifesto commitments, will consider short, medium and long term plans to progress the improvement of Carpenters Estate, including meanwhile uses that will deliver genuine community benefits to estate residents.
- 4.5 The Council will support the people of Carpenters Estate throughout the consultation and regeneration process, assisting residents to build awareness of the stages of redevelopment and the ways that they can be involved in decision making. There will also be continued support from an Independent Tenants and Residents Advisor (ITRA) to provide independent advice on rehousing and decant offers.
- 4.6 The production of a shared vision and outline masterplan for Carpenters Estate will involve complex and detailed work with the community. Residents must have sufficient time to engage in and reflect upon the development of proposals. It is anticipated that this process will take 9-12 months, after which a report will be returned to Cabinet recommending a way forward.
- 4.7 In parallel work will be carried out to consider a range of construction delivery routes for regeneration at Carpenters Estate. This options appraisal with recommendation will be returned to Cabinet with the report on the shared vision and masterplan.

### *Financial impact of 50 percent social rented homes on the dual Joint Venture procurement model*

- 4.8 With the Council's external advisors JLL and KPMG, officers have undertaken a review of the financial impact of changing the tenure mix set out in the outline business case approved at Cabinet in December 2016

from 35 percent affordable homes (with rents of up to 80% of market value) to 50 percent social rented homes.

- 4.9 The financial outcomes of the review are set out at Exempt Appendix B of this report and concludes that it is not commercially viable for the Council to deliver 50 percent of homes at social rent levels applying the scale, scope and contractual parameters of the current dual Joint Venture procurement.
- 4.10 Any redevelopment of Carpenters Estate will require a significant level of investment by the Council, irrespective of the manner in which it is procured. However the regeneration options review will carefully consider, holistically, the financial impact and social benefit of development and the level of control the Council has to own and to direct the use of development profit to prioritise the delivery of the Council's key strategic objectives.

#### *Capital funding considerations*

- 4.11 Cabinet approval was granted in December 2016 for £1.5 million initial capital funding for external consultant fees and project management costs to progress the current dual Joint Venture procurement. Funds were also approved to continue the decant and buy back programme, to acquire residential leaseholds and freeholds.
- 4.12 If the Mayor and Cabinet agree recommendation 2.1.4 to cease the current dual Joint Venture procurement, capital funds expended to date on development of the project would no longer meet the definition of capital expenditure (since there will be no asset) and this expenditure would be classified as revenue. The sum that would be transferred to revenue would be in the region of £1 million. This has been accounted for in the Medium Term Financial Strategy.
- 4.13 This report seeks approval to repurpose the existing approved capital allocation for external fees and project management costs for the dual Joint Venture procurement and utilise this to progress a regeneration options review, as recommendation 2.1.2 of this report.
- 4.14 Capital funds are already committed to the buy back of residential freehold and leasehold properties which are currently in the legal process, pending completion. Approval is sought to continue the programme in the activated decant areas utilising the £86.5 million capital previously approved by Council in February 2018, as recommendation 2.1.3 of this report. No further capital funding for decant and buy back is requested at this time.

#### *Decant programme and progress*

- 4.15 The regeneration of Carpenters Estate has been under consideration for a number of years and a decant programme has been active since 2005.

- 4.16 The Phase 1 decant area comprises the tower blocks Dennison Point, Lund Point and James Riley Point and a limited number of low rise blocks at Doran Walk, in the centre of the estate.
- 4.17 The Phase 2 decant area was activated in January 2018 and includes the low rise blocks and houses of Carpenters Estate in Biggerstaff Road and Warton Road.
- 4.18 There are currently 403 void properties on the estate, almost exclusively within the tower blocks. Remaining, there are 97 secure tenants and 55 non-secure tenants. Over the years a number of properties have been removed from the social housing portfolio through the government's Right to Buy scheme and there are currently 151 properties in leasehold or freehold ownership. Further information on the decant phasing and progress is contained in Appendix C of this report.
- 4.19 The purpose of continuing the decant programme at this time is to continue to prepare the site for redevelopment as soon as possible, taking into consideration the significant and pressing need for more genuinely affordable homes in the borough and the opportunity to provide a number of these additional homes at Carpenters Estate.
- 4.20 In Newham there over 26,000 people on the Housing waiting list (as at March 2018) and 4,500 households in temporary accommodation. The Mayor of Newham has pledged to start building at least 1,000 new council owned homes at social rent levels by 2022 and to start building 100 of these by March 2019.
- 4.21 This commitment sits within the context of a wider approach to housing delivery through existing and planned redevelopment programmes, enabling Newham to address one of the highest housing delivery targets amongst London boroughs.
- 4.22 Whilst the route to redevelopment at Carpenters Estate needs to be defined through consultation with residents, it is clear that there will be a need to increase the number of homes on the site, and that this will require some reconfiguration of the estate.
- 4.23 Throughout the decant process the Council will continue to work with affected residents to find suitable rehousing options, honouring the commitments of the Carpenters Estate Residents' Charter.

## **5 Policy Implications & Corporate Priorities**

- 5.1 The delivery of new homes at social rent is a Mayoral priority that will help to address the housing crisis in Newham.
- 5.2 It will also form an important part of the Council's wider strategic Housing Delivery Plan as outlined in the Housing Delivery Statement approved at Cabinet on 15<sup>th</sup> November 2018.

## **6 Alternatives considered**

### **6.1 The alternatives considered are:**

*Continue with an adapted form of the current Joint Venture procurement*

- 6.2 Officers have sought advice from external legal advisors Bevan Brittan on the option to vary the existing Joint Venture procurement to accommodate the Mayor's Manifesto pledge for the delivery of 50 percent of homes at social rent via a resident-led masterplan.
- 6.3 Any adaption to the requirements of the current Joint Venture procurement must fall within the expectations created in the OJEU Concession Notice and Memorandum of Information advertising the procurement opportunity, as published on 22<sup>nd</sup> August 2017 and the Corrigendum published on 17<sup>th</sup> October 2017.
- 6.4 *Delivery of the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent:* any adaptations to the dual Joint Venture procurement would need to preserve the asset holding and asset management characteristics of the procurement, as advertised.
- 6.5 If the Council were to hold and manage most or all of the social rented housing stock at Carpenters Estate and that comprises 50 percent of the redevelopment, this would reduce the quantum of homes available to be held and managed by the Asset JV. This would have an affect on the commercial viability of the Asset JV as the asset holding opportunity and associated value is significantly reduced.
- 6.6 Furthermore, providers who may have been interested in the Carpenters Estate redevelopment opportunity if asset management was not a requirement would not have been able to pass the Selection Questionnaire stage of the procurement as this required minimum financial standing and experience requirements with regard to asset management. If the asset management requirement were to be substantively removed then such a prequalification requirement would no longer be relevant with consequent risk of any continuing procurement being outside of the scope of the advertised Concession Notice.
- 6.7 *A resident-led masterplan:* the current dual Joint Venture procurement already has a high degree of resident-led focus and community benefit incorporated in the approach but there are further enhancements to resident involvement which could be achieved within the ongoing procurement process.
- 6.8 Greater levels of resident participation could be achieved by resident representatives participating in the dialogue meetings and the evaluation of

tenders, particularly in the shaping of the design, masterplanning, employment and community benefit offerings. However, any revised or adjusted requirements arising from this process would need to remain within the scope of the project as advertised in the OJEU Concession Notice (including the characteristics of a dual Joint Venture and comprehensive redevelopment).

- 6.9 The Council's objective is to adhere to the principles set out in the Mayor of London's Good Practice Guide to Estate Regeneration and involve residents at an earlier stage of the process so that they are able to input to decision making on vision, design, procurement and delivery routes for the regeneration of Carpenters Estate.
- 6.10 The Concession Notice also specifies that the Council seeks a partner to enter into a Joint Venture for the comprehensive redevelopment of Carpenters Estate. This would include the demolition of the existing buildings and re-provision with new. Previous survey and costing advice has indicated that refurbishment of the existing tower block properties would not represent value for money, taking into account the extent of the works required and the resultant service life of the refurbished properties. The Council has commissioned a stock condition survey to refresh the refurbishment costing. This work is ongoing. The condition of the towers has not improved since the previous survey and it is anticipated that the cost of refurbishment will still be significant but at this stage the Council wishes to consider a full range of ambitious but pragmatic options for the delivery of 50 percent social rented homes at Carpenters Estate.

*Extend the pause of the current procurement whilst alternative options to deliver 50 percent home at social rent on Carpenters Estate are assessed.*

- 6.11 The current Joint Venture procurement was paused on 6<sup>th</sup> April 2018, initially for a period of three months. The decision to pause was taken to allow the Council to reflect upon the Joint Venture procurement and review the degree of flexibility within that procurement to optimise delivery of Council priorities. A further pause was implemented, until 14<sup>th</sup> December 2018, to continue the review in the context of the Council's emergent Housing Delivery Plan.
- 6.12 Officers have sought advice from external legal advisors Bevan Brittan on the possibility of and risks associated with pausing the procurement for a further period.
- 6.13 The advice reviews the length of time for which the procurement has already been paused, gives consideration to market changes that may have occurred in the intervening period and whether the opportunity would become attractive to bidders who would later be in a position to bid for the opportunity were it to be re-advertised.
- 6.14 Although there is a lack of case law precedents on this matter, the legal advice indicates that there is an increased risk of procurement challenge to the Council, should it seek to extend the pause beyond the nine month

period that has already been implemented.

## **7 Consultation**

- 7.1 **Lead Member:** Mayor Rokhsana Fiaz on several dates between May 2018 and November 2018 including:  
3<sup>rd</sup> July 2018, 1<sup>st</sup> August 2018, 11<sup>th</sup> September 2018, 10<sup>th</sup> October 2018, 5<sup>th</sup> November 2018
- 7.2 Briefing held with the following Cabinet Members on 23<sup>rd</sup> November 2018:  
Cllr Charlene McClean, Cllr John Gray, Cllr Julianne Marriott, Cllr Susan Masters, Cllr Terence Paul, Cllr Rachel Tripp
- 7.3 Meeting held with the Mayor and residents of Carpenters Estate on 24<sup>th</sup> November 2018
- 7.4 The Council is committed to meaningful consultation and engagement with residents on the future of Carpenters Estate.

## **8 Implications**

### **8.1 Financial Implications**

8.1.1 The Report recommends that the Council review the options to regenerate the Carpenters Estate, with the review funded from budgets that remain from the previous procurement. The increased percentage of social housing in the project will reduce the rental income to the development. This will mean that future development will require some level of subsidy (via S106 receipts, capital receipts, GLA\other grants or increased private sales) in order to be viable. The review of future options will need to reflect this.

8.1.2 The report also recommends continuing the decant of the estate using resources agreed previously by Council. The Budget agreed by Council in February 2018 (Appendices K and L) committed additional capital funding to the Carpenters project between 2018/19 and 21/22 (the period of the MTFS). This to fund the continuing land assembly costs (£86.5m total) and invest in equity in the Development JV. The funding was primarily from the General Fund with a small amount from the HRA.

HRA	£3.675 million
General Fund	£213.329 million

8.1.3 Ending the current procurement will mean all costs related to the procurement become revenue expenditure (there will be no related asset). The expenditure incurred to date is in the region of £1 million although the charge to revenue may be reduced if any of the work

undertaken to date can be reused for any subsequent development.

- 8.1.4 There is a risk of challenge from the unsuccessful bidders – both short and long listed bids could do this and should this occur the costs will increase. Should a challenge be made, it is unlikely that detailed designs will have been developed and bidder costs should be limited.
- 8.1.5 The dual Joint Venture model currently under procurement assumes that the Private Sector Partner will share with the Council the risk and reward of developing out and holding the assets of a wholly rebuilt Carpenters Estate.
- 8.1.6 To participate in a joint venture, a potential Private Sector Partner would seek to realise a minimum level of development profit and would require the Council to fund the shortfall in land value to make the development viable.
- 8.1.7 Financial modelling indicates that a 50% social rented model with the same scale, scope and characteristics of the current Joint Venture procurement will result in a significant negative land value and a very low rate of return on the asset holding vehicle.
- 8.1.8 Taking into consideration the large capital sums involved in funding the Council's participation in the Development Joint Venture, ensuring the development profit, offsetting the negative land value and forward funding the establishment of the Asset Joint Venture the Report recommends that the Council seeks an alternative delivery route for regeneration at Carpenters Estate
- 8.1.9 Any subsequent procurement exercise will incur additional costs in respect of master planning, commercial and legal advice etc. These will need to be quantified and funding sought as part of the Council Medium Term Financial Strategy.
- 8.1.10 The removal of the HRA borrowing restrictions announced after the recent Budget may provide a further source of funding, as the Council will be able to borrow more than previously. It is uncertain that any new procurement would be completed within the timescales required by the current GLA Affordable Homes Programme, so the funding for provision of homes at London Affordable Rents may not be available at the same level of Grant that is available to fund the programme agreed by Cabinet in September 2018.
- 8.1.11 The land owned by the Council in the site is currently within the Housing Revenue Account and it may be necessary to appropriate part or all of the Council owned land to the General Fund if the eventual development proposals involve the provision of non HRA homes. This will be subject of further reports as the phasing of any future development is established



## 8.2 Legal Implications

- 8.2.1 The Council has sought and received advice from external solicitors, Bevan Brittan, throughout this procurement
- 8.2.2 The Council has a wide discretion under EU procurement law principles to discontinue a procurement process at any time and it is not restricted to serious or exceptional circumstances.
- 8.2.3 However, such a decision must comply with the fundamental principles of EU procurement law and in particular those of equal treatment and proportionality. The reasons for any decision to abandon need to be credible and objective.
- 8.2.4 The Council's decision to discontinue the procedure is, in broad terms, based on the change in strategic policy direction and housing tenure mix needs; the unsuitability of the current procurement procedure to be adapted to deliver those needs; as well as the commercial viability of the dual JV approach to deliver those needs.
- 8.2.5 These are legitimate, objective and proportionate reasons to discontinue the current procedure in procurement law terms. The Council's decision to discontinue is well within the broad discretion to abandon afforded by EU procurement rules.
- 8.2.6 In addition to the Council's wide discretion under EU law principles, the documents issued to bidders (the *Invitation to Submit Outline Solutions* (ISOS)) confirmed that the Council reserved the right at any time not to award a contract and to withdraw from, suspend or terminate the procurement procedure or any part of it.
- 8.2.7 The ISOS issued to bidders also affirmed that they are liable for their own costs in participating in the procurement. The Council accepted no liability for costs incurred by any bidder if the procurement process ceased or a contract was not awarded.
- 8.2.8 In terms of alternatives to discontinuance, the Council has already paused the procurement process since April 2018. As to any further pause to consider procurement strategy and options, the key issue is whether as time goes on, the market changes and the opportunity would become attractive to bidders who would later be in a position to bid for the opportunity were it to be re-advertised.
- 8.2.9 The initial pause in activity and consequent extension of the procurement timetable in terms of months was well within market expectations and tolerances for this procurement and was low risk. However, if the pause were to extend to, for example, a year, the

procurement is at greater risk and more susceptible to the argument that it ought to be re-advertised rather than reactivated.

8.2.10 The Council has duties to consult both under Housing Act consultation requirements for Carpenters residents and generally at a high level in terms of how the Council meets its housing duties. The remaining residents of the Carpenters Estate, those who have already moved with expectations of moving back and more widely those residents interested in the development and regeneration of the Estate will have expectations around consultation on the decision and the next steps.

### **8.3 Equalities Implications**

8.3.1 These are set out in the Equalities Impact Assessment at Appendix D of this report.

### **8.4 Other Implications relevant to this report:**

8.4.1 None

## **9 Background Information used in the preparation of this report**

9.2 Cabinet Paper 15<sup>th</sup> December 2016

9.3 Delegated Decision of 29<sup>th</sup> September 2017 approving the decant and phasing strategy for Carpenters Estate

9.4 Carpenters Residents' Charter

## **10 Financial Approvals to date**

### **10.1 Cabinet Report December 2016**

Cabinet in December 2016 approved the Carpenters Outline Business Case, which included anticipated costs and income to the council over the life of the scheme and requested funding associated with phases 1 and 2 of the project covering:

*Phase 1*- Preparation, including: capacity and viability study; preparation of OJEU documents; finalising Cooperation Agreement with the WCC; finalising MOU with potential anchor tenant; progressing acquisition within the active decant area

*Phase 2* – Procurement, including: managing and concluding a Competitive Dialogue process to subsequently form a contract with a Joint Venture partner; expanding the active decant area to accelerate property acquisition and progress vacant possession

The Business Case set out anticipated site assembly costs of £86.5m and specifically requested:

- Initial Capital Funding of £1.5m for external fees and project management
- £6.5m for next phase of acquisitions and decants and £3.0m for opportunity acquisitions.

## **10.2 Cabinet February 2017**

The financial approval for the council's capital programme is via full Council. The approvals relevant to the Carpenters scheme are:

2016/2017: £1.445m

Capital Programme agreed as part of 2016/17 budget report. The overall capital programme contained £8.078m of unallocated resources.

## **10.3 Council February 2017**

2017/2018: £10.95m

Capital Programme agreed as part of the February 2017 budget report which included £37.341m of "other Schemes", with allocation being subject to business case approval and needing to follow the internal approval process before permission to spend." (para 10.21)

The underspend from 2017/2018 was transferred to the following year.

## **10.4 Council February 2018**

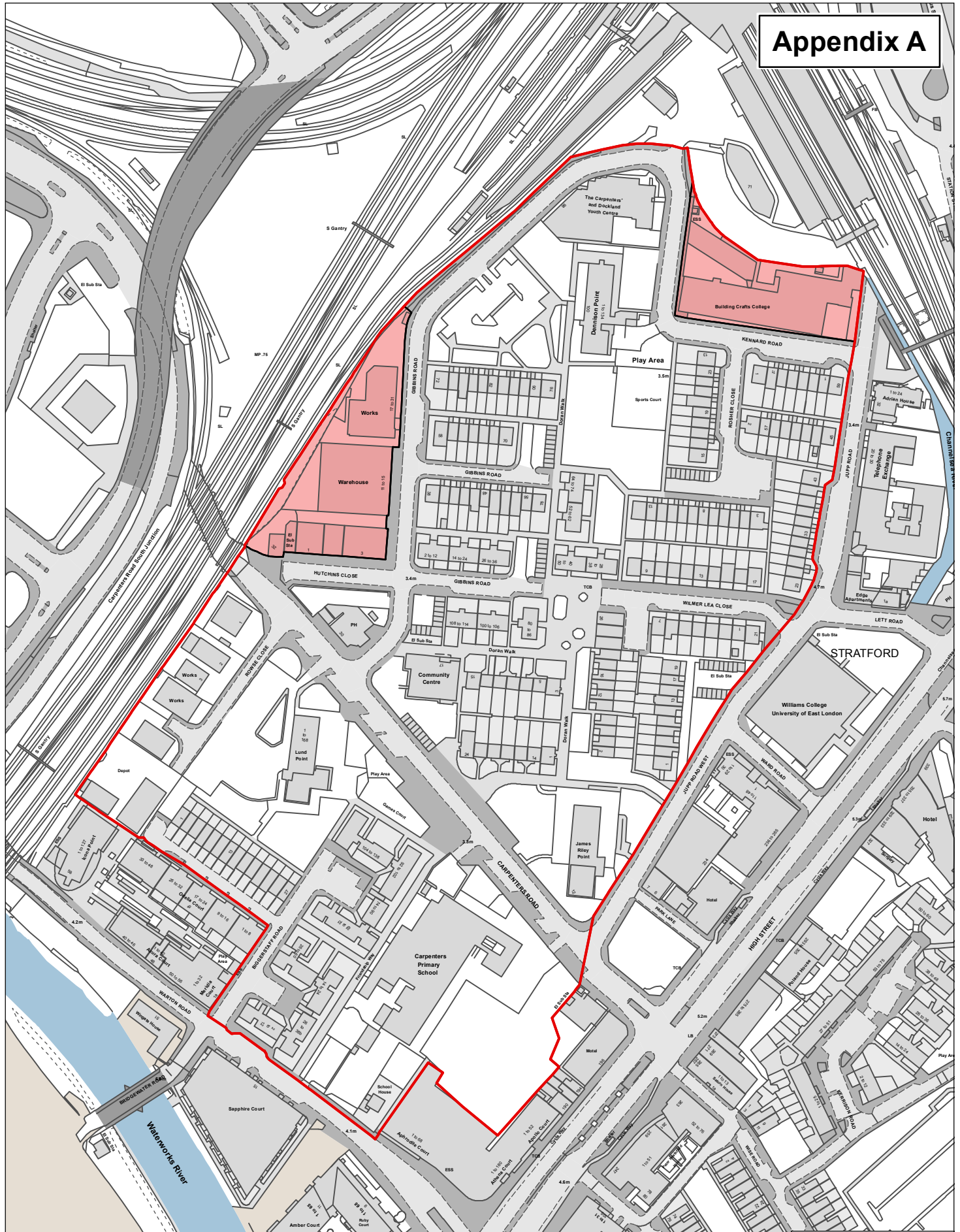
2018/2019: £217m

The Budget report agreed by Council in February 2018 (Appendices K and L) committed additional capital funding to the project between 2018/19 and 21/22 (the period of the MTFS). This to fund the continuing land assembly costs (£86.5m total) and invest in equity in the Development JV. The funding was primarily from the General Fund with a small amount from the HRA.

- HRA £3.675 million
- General Fund £213.329 million

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# Appendix A



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- Site Boundary
- Worshipful Company of Carpenters

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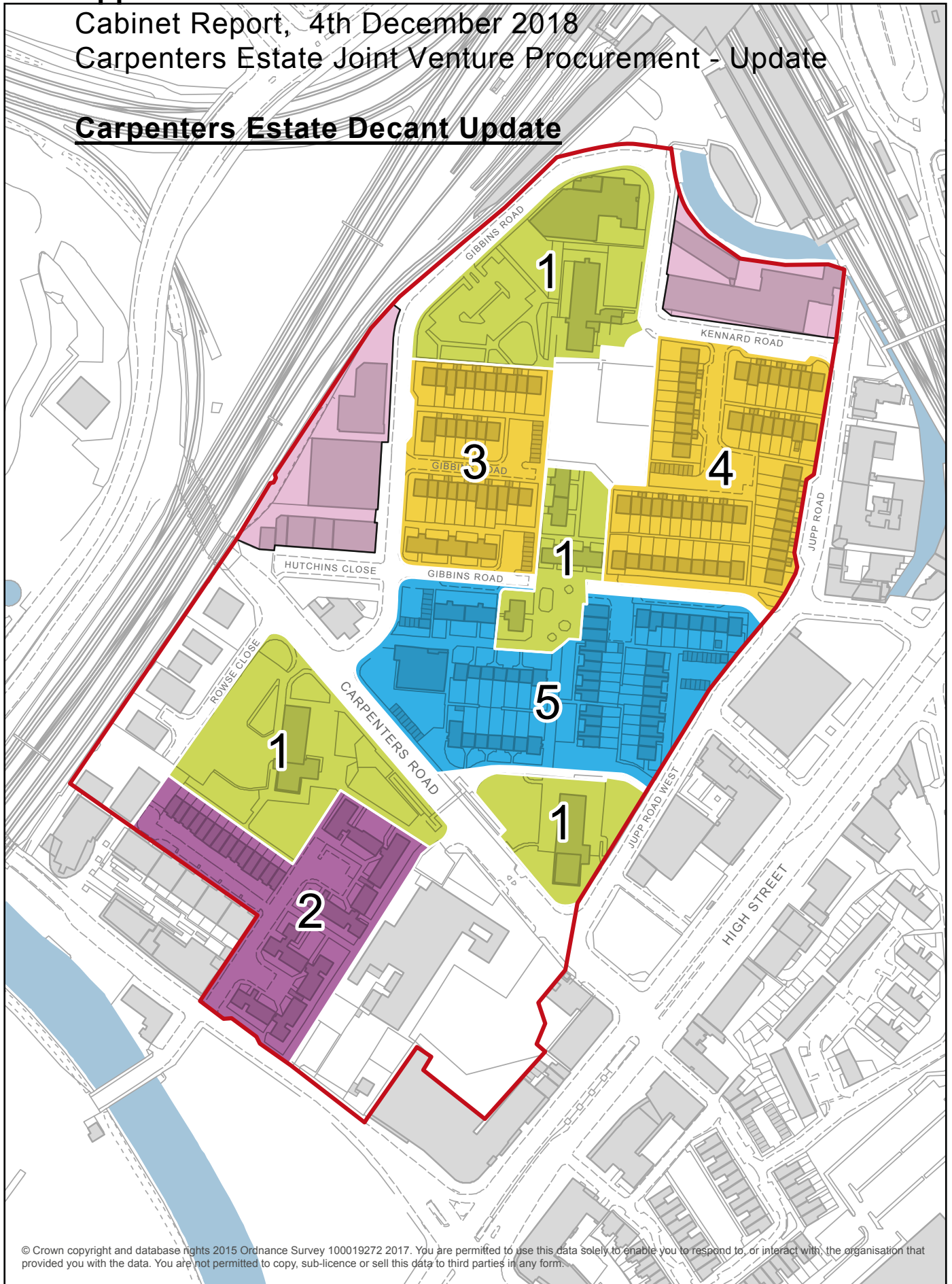


## Appendix C

Cabinet Report, 4th December 2018

Carpenters Estate Joint Venture Procurement - Update

### Carpenters Estate Decant Update



Land Assembly Phasing

Scale 1:2,500 @ A4



Site Boundary



Worshipful Company of Carpenters



## Total Tenant Decants/Moves from Carpenters Estate, as at 31.10.18

### Lund Point Tower Block 98 Moves in Total

#### MOVED TO:

Location	E15/E20	Other Newham	Out of Borough					Total
	70	20	8					98
Property Type	House	Bungalow	Ground Floor Flat	Low Rise	High Rise	Sheltered	Maisonette	
	27	4	10	27	22	6	2	98
Bedsize	Same Bedsize	Increased Bedsize	Downsize	Split Household				
	64	31	2	1				98
Landlord	LBN	Housing Association	Other L.A.					
	80	14	4					98

### Dennison Point Tower Block 69 Moves in Total

#### MOVED TO:

Location	E15/E20	Other Newham	Out of Borough					Total
	52	15	2					
Property Type	House	Bungalow	Ground Floor Flat	Low Rise	High Rise	Sheltered	Maisonette	
	33	1	5	15	11	3	1	69
Bedsize	Same Bedsize	Increased Bedsize	Downsize	Split Household				
	36	21	8	4				69
Landlord	LBN	Housing Association	Other L.A.					
	50	19	0					69

### James Riley Point Tower Block 90 Moves in Total



**MOVED TO:**

Location	E15/E20	Other Newham	Out of Borough					Total
	59	26	5					
Property Type	House	Bungalow	Ground Floor Flat	Low Rise	High Rise	Sheltered	Maisonette	
	49	1	14	13	7	2	4	90
Bedsize	Same Bedsize	Increased Bedsize	Downsize	Split Household				
	37	32	13	8				90
Landlord	LBN	Housing Association	Other L.A.					
	68	22	0					90

**Doran Walk Low Rise****20 Moves in Total****MOVED TO:**

Location	E15/E20	Other Newham	Out of Borough					Total
	17	2	1					20
Property Type	House	Bungalow	Ground Floor Flat	Low Rise	High Rise	Sheltered	Maisonette	
	2	2	4	8	2	1	1	20
Bedsize	Same Bedsize	Increased Bedsize	Downsize	Split Household				
	17	3	0	0				20
Landlord	LBN	Housing Association	Other L.A.					
	18	2	0					20

**Biggerstaff/Warton Rd****5 Moves in Total****MOVED TO:**

Location	E15/E20	Other Newham	Out of Borough					Total
	4	0	1					5

Property Type							
	House	Bungalow	GFF	Low Rise	High Rise	Sheltered	Maisonette
Bedsizes	3	1				1	5
Bedsizes	Same Bedsizes	Increased Bedsizes	Downsize	Split Household			
	4	1	0	0			5
Landlord							
	LBN	Housing Association	Other L.A.				
	4	0	1				5

# CARPENTERS ESTATE OCCUPANCY DATA 29.10.18

	1B	2B	3B	4B	5B	TOTAL
<b>TOWER BLOCKS</b>						
Secure tenant	3	4	1	0	0	8
Non-secure tenant	0	0	0	0	0	0
Leasehold	6	13	9	0	0	28
Freehold	0	0	0	0	0	0
Void	123	181	94	0	0	398
Guardian	0	0	0	0	0	0
<b>LOW RISE FLATS</b>						
Secure tenant	43	10	0	0	0	53
Non-secure tenant	43	0	0	0	0	43
Leasehold	25	4	0	0	0	29
Freehold	0	0	0	0	0	0
Unauthorised	1	0	0	0	0	1
Void	4	0	0	0	0	4
Guardian	1	0	0	0	0	1
<b>HOUSES</b>						
Secure tenant	0	0	25	10	1	36
Non-secure tenant	0	0	9	3	0	12
Leasehold	0	0	0	0	0	0
Freehold	0	0	69	25	0	94
Unauthorised	0	0	1	0	0	1
Void	0	0	1	0	0	1
Guardian	0	0	0	1	0	1
						<b>710</b>

RESIDENT LH/FH	LANDLORD/ INVESTOR
19	9
16	15
62	32

TOWER BLOCKS 434 Units  
 LOW RISE FLATS 131 Units  
 HOUSES 145 Units

**710**

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## Appendix D

Cabinet Report, 4<sup>th</sup> December 2018

Carpenters Estate Joint Venture Procurement – Update

## Equalities Impact Assessment

(consultation and engagement, review of regeneration options and cessation of Joint Venture procurement)

Version number	1.0
Date last reviewed	
Approved by	Robin Cooper Head of Regeneration
Date approved	26 November 2018
Next review date	4 April 2019

### 1. Management of the EqlA

Keith Smith, Consultation Manager – Regeneration Service

This Equality Impact Assessment (EQIA) is a live document that will be updated during the course of the regeneration and will form part of the Carpenters Estate programme governance. Additional EqlAs may be conducted.

### 2. Scope / focus of the EqlA

This EqlA has been completed to assess the equality implications of recommendations contained within a report to the Mayor of Newham in consultation with Cabinet in December 2018. These recommendations are:

- That the Council develops and implements a programme of consultation and engagement, to inform the Carpenters Estate regeneration options review below
- That the Council undertakes a review of regeneration options for Carpenters Estate (including meanwhile uses) to identify the optimum route to deliver the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent; the review to be undertaken utilising existing capital funding approvals.
- To continue the decant programme in decant phases 1 and 2, as activated in accordance with recommendation iii) of the 15th December 2016 Cabinet Report under delegated authority utilising existing capital funding.

- To cease the current OJEU procurement for a Joint Venture partner/s for the redevelopment of Carpenters Estate, as commenced on 14th August 2017.

Consulting and engaging with the community, ceasing the current procurement, continuing with the decant programme and reviewing regeneration options is aimed at enabling the largest proportion of socially rented properties on the Carpenters Estate possible to benefit existing and future residents.

The EqIA assesses the impact on residents and users, in particular, disadvantaged or excluded groups of people. It identifies and assesses potential impacts (positive and negative) of the proposal, in order to make recommendations to mitigate against any adverse impacts on the population, enhance positive impacts and address any inequalities.

A map of the Carpenters Estate is attached at Appendix A.

### **3. Identification of policy aims, objectives and purpose**

The Council is committed to putting people at the heart of everything it does, enabling Newham residents to play a key role in shaping the borough and building better neighbourhoods that work for everyone.

Through Citizens' Assemblies, residents have identified housing for local people as a key issue. It is also a top priority for the Council. Mayor Fiaz has pledged to deliver 50 percent of all homes on Newham owned land as genuinely affordable and at social rent levels, including those to be provided at Carpenters Estate.

The Council commenced a procurement in August 2017, under the previous administration, to seek a Joint Venture partner for the comprehensive redevelopment of Carpenters Estate; and to also hold and manage a portion of the developed homes for income generation (a dual development and asset holding Joint Venture).

Mayor Fiaz pledged to review this decision and to prioritise the delivery of the largest proportion of social rented Council homes at Carpenters Estate that is possible, aiming for a minimum of 50 percent.

Officers have reviewed the potential for the current dual Joint Venture procurement to deliver this ambition and to realise other key strategic objectives of the new administration, including:

- the engagement of residents on vision, design, procurement and delivery from the outset of estate regeneration projects to ensure that proposals are supported and championed by the community, in line with the

principles of the Mayor of London's Good Practice Guide to Estate Regeneration

- the Council leading on and controlling the quality, scale and pace of housing delivery on Newham owned land.

The review concludes that on balance, delivery of this administration's key strategic objectives would be restricted by the scope and contractual parameters of the current dual Joint Venture procurement, as set out in the OJEU Concession Notice and Memorandum of Information published on 22nd August 2017 and the Corrigendum published on 17th October 2017. The reasons for this are set out further in this report and its appendices.

The primary recommendations are therefore to cease the current dual Joint Venture procurement and to engage further with residents to define a route for the delivery of more homes at Carpenters Estate, aiming for a minimum of 50 percent at genuinely affordable and social rent levels, and to create a strong and sustainable neighbourhood in a way that is financially viable for the Council.

The decanting programme is currently underway for the following properties: James Riley Point, Lund Point, Dennison Point, 52-62 Doran Walk, 2-138 & 1-27 Biggerstaff Road and 26-38B Warton Road. The Cabinet report recommends the continuation of the current decant programme.

#### 4. Assessment of Relevance

Protected characteristic	Assessment of relevance High, Medium, Low	Provide evidence
Class or socio-economic disadvantage	<p><b>High</b></p> <p>Regeneration has the potential to deliver new homes across a range of typologies, including the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent. This would increase the no. of genuinely affordable units on the estate benefitting socio-economically disadvantaged people.</p> <p>It has the potential to deliver an improved public realm, enhanced connections to local area, improved educational and community facilities, training and job opportunities and provide a high quality of life.</p> <p>Residents in active decant areas will be required to enable their homes to be demolished for redevelopment to take place.</p> <p>The Residents Charter commitments will be</p>	<p><i>Northgate housing information on secure tenants in active decant areas (Nov 2018):</i></p> <ul style="list-style-type: none"> <li>– 45.09% of secure council tenants were Housing Benefits claimants.</li> </ul> <p><i>Northgate information on all secure tenants across on Carpenters housing information (Nov 2018):</i></p> <ul style="list-style-type: none"> <li>– 52.8% of secure council tenants were Housing Benefits claimants.</li> </ul> <p>Northgate information on all secure tenants across on Carpenters housing information (Nov 2018):</p> <ul style="list-style-type: none"> <li>- 74.43% of non-secure tenants were Housing Benefit claimants</li> </ul> <p><i>Census 2011:</i></p> <ul style="list-style-type: none"> <li>– Stratford and New Town ward has 39% of</li> </ul>



	<p>adhered to, to minimise negative impacts.</p> <p>Support through the rehousing and regeneration process will be provided by Housing and Regeneration officers</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the Council on Housing Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options Centre or talk to their landlord about alternative accommodation.</p>	<p>the population not working compared with 23.2% for England as a whole.</p> <ul style="list-style-type: none"> <li>– Economic activity stands at 61% compared to 76.8% nationally.</li> <li>– 30% of households have multiple deprivation compared to 26% for London as a whole.</li> <li>– The long term sick or disabled make up 9% of the population compared to a national average of 4.6%.</li> <li>– 8% receive out of work benefits compared with 5% nationally</li> </ul> <p><i>Data provided by the 2015 GLA intelligence for Newham:</i></p> <ul style="list-style-type: none"> <li>- Unemployment rate 9.1%, higher than Greater London at 6.1%</li> <li>- 11% proportion of working age with no qualifications, comparable to 7.3% in Greater London</li> <li>- Proportion of young people not in education or training 16-18 4.3% higher than London and greater London at 3.3% and 3.4% respectively.</li> </ul>
Age	High	Northgate housing information on secure

	<p>Regeneration has the potential to deliver new homes across a range of typologies (including wheelchair accessible properties and adaptable lifetime homes), including the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent. This would increase the no. of genuinely affordable units on the estate.</p> <p>It has the potential to deliver an improved public realm, enhanced connections to local area, improved educational and community facilities, training and job opportunities and provide a high quality of life.</p> <p>Regeneration has the potential to provide the opportunity to address the specific needs of particular age groups e.g. through educational provision and housing typology.</p> <p>Support through the rehousing and regeneration process will be provided by Housing and Regeneration officers.</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the Council's on Housing</p>	<p><i>tenants in active decant areas (Nov 2018):</i></p> <ul style="list-style-type: none"> <li>– 25-44 (15.68%)</li> <li>– 45-59 years (45.09%)</li> <li>– 60 -74 yrs (29.41%)</li> <li>– 75 – 90 yrs (7.84%)</li> <li>– 90+ yrs (1.96%)</li> </ul> <p><i>Northgate housing information on all secure tenants on Carpenters (Nov 2018):</i></p> <ul style="list-style-type: none"> <li>– 25-44 (9.37%)</li> <li>– 45-59 years (39.5%)</li> <li>– 60 -74 yrs (31.25%)</li> <li>– 75 – 90 yrs (18.75%)</li> <li>– 90+ yrs (1.04%)</li> </ul> <p><i>Northgate housing information on all non-secure tenants on Carpenters (Nov 2018):</i></p> <ul style="list-style-type: none"> <li>– 25-44 (63.15%)</li> <li>– 45-59 years (26.31%)</li> <li>– 60 -74 yrs (10.52%)</li> </ul> <p><i>Census 2011 (Stratford and New Town):</i></p> <ul style="list-style-type: none"> <li>- 0-4 (6%)</li> <li>- 5-17 (11%)</li> <li>- 18-24 (17%)</li> <li>- 25-44 (46%)</li> <li>- 45-59 12%)</li> </ul>
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	<p>Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options or talk to their landlord about alternative accommodation.</p>	<ul style="list-style-type: none"> <li>- 60-74 (5%)</li> <li>- 75-89 (2%)</li> <li>- 90 and over (0%)</li> </ul>
Disability	<p><b>High</b></p> <p>Regeneration has potential to deliver new homes across a range of typologies (including wheelchair accessible properties and adaptable lifetime homes), including the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent. This would increase the no. of genuinely affordable units on the estate.</p> <p>It has the potential to deliver an improved public realm, enhanced connections to local area, improved educational and community facilities, training and job opportunities and provide a high quality of life which will benefit people living with a disability.</p> <p>Regeneration has the potential to address the particular needs of this equality strand e.g. through housing typology.</p> <p>Support through the rehousing and</p>	<p><i>Northgate housing information on secure tenants in active decant areas (Nov 2018):</i></p> <p>Mobility impaired – 3.92%</p> <p>Declined to provide information – 11.76%</p> <p>No disability – 56.86%</p> <p><i>Northgate housing information on all secure tenants across on Carpenters (Nov 2018):</i></p> <p>Mobility impaired – 5.2%</p> <p>Declined to provide information – 14.5%</p> <p>No disability – 55.20%</p> <p><i>Northgate information on all non-secure tenants across on Carpenters housing information (Nov 2018):</i></p> <p>Mobility impairment / mental health/other – 22.8%</p> <p>Declined to provide information – 70.17%</p> <p>No disability – 7.01%</p>

	<p>regeneration process will be provided by Housing and Regeneration officers.</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the Council's on Housing Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options or talk to their landlord about alternative accommodation.</p>	<p><i>Census 2011:</i></p> <ul style="list-style-type: none"> <li>- The long term sick or disabled make up 9% of the population</li> </ul> <p><i>Data provided by the 2015 GLA intelligence for Newham:</i></p> <ul style="list-style-type: none"> <li>- 12.7% within the borough are of working age and with a disability, comparable to 16.1% in Greater London.</li> </ul>
Pregnancy and maternity	<p><b>Low</b></p> <p>Regeneration has the potential to deliver new homes across a range of typologies, including the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent. This would increase the no. of affordable units on the estate.</p> <p>It has the potential to deliver an improved public realm, enhanced connections to local area, improved educational and community facilities, training and job opportunities and provide a high quality of life that will benefit all groups. However there is no specific impact on this group.</p>	Statistics not available.

	<p>Support through the rehousing and regeneration process will be provided by a dedicated Housing and Regeneration team.</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the Council's on Housing Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options or talk to their landlord about alternative accommodation.</p>	
Race	<p><b>Low</b></p> <p>Regeneration has the potential to deliver new homes across a range of typologies (including wheelchair accessible properties and adaptable lifetime homes), including the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent. This would increase the no. of genuinely affordable units on the estate.</p> <p>It has the potential to deliver an improved public realm, enhanced connections to local area, improved educational and community</p>	<p><i>Northgate housing information on secure tenants in active decant areas (Nov 2018):</i></p> <p>43.18% white British 50.9% BME 5.88% Other</p> <p><i>Northgate housing information on all secure tenants across on Carpenters (Nov 2018):</i></p> <p>47.91% white British 46.87% BME 5.2% Other</p>

	<p>facilities, training and job opportunities and provide a high quality of life which will benefit all groups. However there is no specific impact on this group.</p> <p>Support through the rehousing and regeneration process will be provided by Housing and Regeneration officers.</p> <p>Where residents need an interpreter or translation is required arrangements to help will be made.</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the Council's on Housing Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options or talk to their landlord about alternative accommodation.</p>	<p><i>Northgate housing information on all non-secure tenants across on Carpenters n (Nov 2018):</i></p> <p>33.3% White 63.15% BME 3.5% Other 1.75% declined</p> <p><i>Census data, 2011:</i></p> <p>In 2011, Stratford and New Town ward had a larger white British population (21%) than the Borough (17%) average.</p> <p>59% of people in these wards are from BME communities compared with 39% for London.</p>
Religion / belief	<p><b>Low</b></p> <p>Regeneration has the potential to deliver new homes across a range of typologies, including the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent. This would increase the no. of affordable units on</p>	<p><i>Census data 2011:</i></p> <p>In 2011, Stratford and New Town ward population were comprised of the following</p> <ul style="list-style-type: none"> <li>– 46% Christian</li> <li>– 1% Buddhist</li> <li>– 6% Hindu</li> </ul>

	<p>the estate.</p> <p>It has the potential to deliver an improved public realm, enhanced connections to local area, improved educational and community facilities, training and job opportunities and provide a high quality of life for all groups.. However there is no specific impact on this group.</p> <p>Support through the rehousing and regeneration process will be provided by Housing and Regeneration officers.</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the Council's on Housing Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options or talk to their landlord about alternative accommodation.</p>	<ul style="list-style-type: none"> <li>– 21% Muslim</li> <li>– 1% Sikh</li> <li>– 17% No religion</li> <li>– 0.2% Jewish</li> <li>– 0.1% Agnostic</li> </ul>
Sex	<p><b>Low</b></p> <p>Regeneration has the potential to deliver new homes across a range of typologies, including the largest proportion of socially rented Council homes on the estate that is possible,</p>	<p><i>Northgate active decant areas secure tenants information Nov 2018:</i></p> <ul style="list-style-type: none"> <li>– 43.13% - male</li> <li>– 56.86% - female</li> </ul>

	<p>aiming for a minimum of 50 percent. This would increase the no. of genuinely affordable units on the estate.</p> <p>It has the potential to deliver an improved public realm, enhanced connections to local area, improved educational and community facilities, training and job opportunities and provide a high quality of life that will benefit all groups. However there is no specific impact on this group.</p> <p>Support through the rehousing and regeneration process will be provided by Housing and Regeneration officers..</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the Council's Housing Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options or talk to their landlord about alternative accommodation.</p>	<p><i>Northgate information on all secure tenants across on Carpenters housing information (Nov 2018):</i></p> <ul style="list-style-type: none"> <li>- 44.79% - male</li> <li>- 55.20% - female</li> </ul> <p>Northgate information on all non-secure tenants across on Carpenters housing information (Nov 2018):</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 49.12% - male</li> <li><input type="checkbox"/> 50.87% - female</li> </ul> <p>ONS, 2013:</p> <ul style="list-style-type: none"> <li>- 52% Male</li> <li>- 48% - female</li> </ul>
Sexual orientation	<p><b>Low</b></p> <p>Regeneration has the potential to deliver new homes across a range of typologies, including the largest proportion of socially rented</p>	



	<p>Council homes on the estate that is possible, aiming for a minimum of 50 percent. This would increase the no. of affordable units on the estate.</p> <p>It has the potential to deliver an improved public realm, enhanced connections to local area, improved educational and community facilities, training and job opportunities and provide a high quality of life that will benefit all groups. However there is no specific impact on this group.</p> <p>Support through the rehousing and regeneration process will be provided by Housing and Regeneration officers.</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the Council's on Housing Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options or talk to their landlord about alternative accommodation.</p>	
Transgender	<p><b>Low</b></p> <p>Regeneration has the potential to deliver new</p>	

	<p>homes across a range of typologies, including the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent. This would increase the no. of genuinely affordable units on the estate.</p> <p>It has the potential to deliver an improved public realm, enhanced connections to local area, improved educational and community facilities, training and job opportunities and provide a high quality of life that will benefit all groups. However there is no specific impact on this group.</p> <p>Support through the rehousing and regeneration process will be provided by a dedicated Housing and Regeneration team.</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the Council's on Housing Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options or talk to their landlord about alternative accommodation.</p>	
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Table 1

## 5. Relevant data, research and consultation

**Data** provided above has been drawn from the Northgate tenancy management system November 2018. Northgate information has been included for secure tenants in active decant areas and for the estate as a whole and information on non-secure tenants across the estate is also included. Estate level demographic information is not available for leaseholders and freeholders at this stage but this is being sought from those in active decant areas. Information is not available on private tenants. Where estate specific information is not available it has been drawn from the Office for National Statistics and 2011 Census at Stratford & New Town ward and borough level. 2015 GLA Intelligence for Newham has also been used.

### Consultation

The redevelopment of the Carpenters Estate has been subject to community engagement and consultation over a number of years. This has involved both work with a representative group of residents via the Joint Residents Steering Group (JRSG) and with residents of the wider community. This has been undertaken around the development of masterplans for the estate, decanting of residents and development of residents' charters.

The December 2018 Cabinet recommendations will enable the redevelopment of the Carpenters Estate to provide more genuinely affordable homes, to do that in a way that puts residents currently on the estate and beyond at the heart of the endeavour, and in a way that is financially sustainable for the Council as a whole. Consultation and engagement is at the heart of the recommendations. A programme of consultation and engagement will inform the review of the regeneration options.

The Mayor of Newham has met Carpenters Estate residents at a public meeting on the estate on 24 November 2018 to outline the recommendations of the Cabinet report and get feedback.

## 6. Assessment of Impact and outcomes

It has been determined that overall the regeneration of Carpenters Estate will deliver many positive benefits to the whole community in the area and across all the equality strands with opportunities to address the needs of particular equalities groups.

The ceasing of the Joint Venture procurement, the review of the regeneration options and the consultation and engagement with residents will enable the regeneration of Carpenters Estate to benefit existing and future residents and put residents at the heart of the endeavour.

This assessment focuses on the impact of the project on the most relevant protected categories. These have been identified as socio-economic disadvantage, age and disability. It sets out the recommendations that will be put in place to mitigate where there is the potential for any adverse impact.

Equality Strand	Socio-economic disadvantage	Age	Disability	Outcomes/ Recommendations/ Mitigations
Rehousing and provision of good quality new homes	<p><b>NEGATIVE</b> All residents living in properties within redevelopment sites will need to be relocated for regeneration to progress.</p> <p><b>POSITIVE</b> Rehousing will enable individual needs to be addressed as part of the process and ensure suitable accommodation is provided meeting the requirements of those</p>	<p><b>NEGATIVE</b> All residents living in properties within redevelopment sites will need to be relocated for regeneration to progress.</p> <p><b>POSITIVE</b> New homes will be built to lifetime homes standards to ensure that they are adaptable to individuals and families changing needs over</p>	<p><b>NEGATIVE</b> All residents living in properties within redevelopment sites will need to be relocated in order for regeneration to progress.</p> <p><b>POSITIVE</b> New homes will be built to lifetime homes standards to ensure that they are adaptable to individuals and families</p>	The redevelopment of Carpenters Estate has potential to deliver new homes including the largest proportion of socially rented Council homes on the estate that is possible, aiming for a minimum of 50 percent. This would increase the no. of genuinely affordable units on the estate. for existing and new residents.

	<p>who have to be rehoused in line with the commitments in the Residents Charter</p> <p>Residents will be supported and kept informed through the process by Housing and Regeneration officers.</p> <p>Improving the quality of housing will benefit existing residents if they choose to return after redevelopment has taken place or if they move into one of the new homes built in the regeneration area</p> <p>Regeneration has the potential to provide genuinely affordable homes for residents.</p> <p>Both secure Council tenants and home</p>	<p>time.</p> <p>Residents will be supported and kept informed through the process by Housing and Regeneration officer.</p>	<p>changing needs over time and there will be wheelchair accessible homes.</p> <p>Residents will be supported and kept informed through the process by Housing and Regeneration officers.</p>	<p>The Council's commitments to residents contained within the Carpenters Estate Residents' Charter will continue to be applied.</p> <p>For Council secure tenants these include the right remain in the area as a Council tenant, financial compensation and the right to return to the new development in the community.</p> <p>For leaseholders and freeholders these include the right to first refusal on properties for sale in the new development and financial compensation.</p> <p>Ongoing consultation will be undertaken with affected residents, in relation accordance with</p>
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	<p>owners will receive financial compensation to ensure they are not financially disadvantaged by the need to move home due to the regeneration proposals.</p> <p>Levels of genuinely affordable housing on the Carpenters Estate will increase including at least 50% social rent potential for shared ownership options.</p>			<p>an emerging development and decant programme, regarding rehousing and property purchase.</p> <p>Non-secure tenants who are not covered by the Residents Charter will be able to seek assistance from the council on Housing Options.</p> <p>Private tenants will also seek advice from the Council on Housing Options Centre or talk to their landlord about alternative accommodation.</p>
Improved public realm	<p><b>POSITIVE</b></p> <p>There is potential to improve the public realm to create a more attractive area that enhances the local</p>	<p><b>POSITIVE</b></p> <p>There is potential to improve the public realm to create a more attractive area that enhances the local</p>	<p><b>POSITIVE</b></p> <p>There is potential to improve the public realm to create a more attractive area that fully accessible for people</p>	<p>The regeneration has the potential to provide high quality public spaces for community benefit.</p> <p>Consultation to be</p>

	environment. This would benefit all socio-economic groups.	environment. This would benefit all age groups.	with disabilities.	undertaken with the community regarding public realm proposals.
Enhanced connections to surrounding areas.	<b>POSITIVE</b> There is potential for improved connections to surrounding areas including access into Stratford Station which would benefit all socio-economic groups.	<b>POSITIVE</b> There is potential for Improved connections to surrounding areas including access into Stratford Station which would benefit all age groups.	<b>POSITIVE</b> There is potential for Improved connections to surrounding areas including access into Stratford Station which would benefit people with disabilities.	Regeneration has potential to provide improved connections to benefit the whole community.  LBN will work with key stakeholders such as TfL to ensure provision reflects local needs and the community are kept informed.
Education	<b>POSITIVE</b> There is potential for re-provision and expansion of the Carpenters Primary School within the site to meet current and projected needs which would benefit residents of Carpenters and the wider community. This will benefit all socio-economic groups.	<b>POSITIVE</b> There is potential for re-provision and expansion of the Carpenters Primary School within the site to meet current and projected needs which would benefit residents of Carpenters and the wider community. This will benefit primary school age children and their	<b>POSITIVE</b> There is potential for the re-provision and expansion of Carpenters Primary School within the site to meet current and projected needs which would benefit residents of Carpenters and the wider community. New facilities will be fully accessible for those with disabilities.	The potential redevelopment of Carpenters Primary School Estate would provide improved educational facilities for local people.  LBN will work with key stakeholders such as Carpenters Primary School to ensure

		families.		<p>provision reflects local need and demand and that the community are kept informed and consulted as appropriate.</p> <p>Construction of a new Carpenters Primary School would occur before demolition of existing premises to minimise disruption to teaching and enabling a smooth transition to the new facilities.</p>
Jobs	<p><b>POSITIVE</b></p> <p>The regeneration of Carpenters Estate would create jobs during construction and there is potential for commercial space providing opportunities and benefits for residents within Stratford.</p> <p>The creation of more local jobs would benefit</p>	<p><b>POSITIVE</b></p> <p>The regeneration of Carpenters Estate would create jobs during construction and there is potential for commercial space providing opportunities and benefits for residents within Stratford.</p> <p>The creation of more local jobs would benefit</p>	<p><b>POSITIVE</b></p> <p>The regeneration of Carpenters Estate would create long term jobs with potential for commercial space providing significant opportunities and benefits for residents within Stratford.</p> <p>The creation of more local jobs would benefit</p>	<p>Both construction and long-term local jobs would be created through the redevelopment of Carpenters Estate.</p> <p>All partners and their contractors would be required to sign up to an employment charter to ensure that Newham residents benefit from job opportunities arising from</p>



	socio-economically disadvantaged residents.	those of working age and their families.	all residents including those with disabilities.	regeneration.  The Council would ensure that any future development partner(s) work in close partnership with LBN's Economic Regeneration Team and Workplace to ensure that job and training opportunities are maximised for Newham residents.
Training	<p><b>POSITIVE</b> The potential for development of an improved and larger Building Crafts College would provide quality skills training for the benefit of local Stratford residents.</p> <p>This would benefit all socio-economic groups and provide opportunities for socio-economically disadvantaged residents.</p>	<p><b>POSITIVE</b> The potential for the development of an improved and larger Building Crafts College would provide quality skills training for the benefit of local Stratford residents.</p> <p>This would benefit young adults in the area.</p>	<p><b>POSITIVE</b> The potential for the development of an improved and larger Building Crafts College would provide quality skills training for the benefit of local Stratford residents.</p> <p>The new facilities will be fully accessible for people with disabilities.</p>	<p>The potential for a new Building Crafts College would provide quality skills training opportunities for local residents.</p> <p>Construction of a new College would occur before demolition of existing premises to minimise disruption to the training opportunities and enabling a smooth transition to the new</p>

				facilities.
Interim and construction phases	<p><b>NEGATIVE</b></p> <p>There is potential for disruption to neighbouring residents of all socio-economic groups during demolition and construction phases.</p> <p>For example there is a risk that dust, noise and access issues will disrupt people living in close proximity to the construction works.</p> <p>Whilst properties are being emptied and before they are demolished, there is potential for squatting and antisocial behaviour.</p> <p>Vacant sites may be vulnerable to misuse and anti-social behaviour creating problems for local residents.</p>	<p><b>NEGATIVE</b></p> <p>There is potential for disruption to neighbouring residents in all age groups during demolition and construction phases.</p> <p>For example there is a risk that dust, noise and access issues will disrupt people living in close proximity to the construction works.</p> <p>Whilst properties are being emptied and before they are demolished, there is potential for squatting and antisocial behaviour.</p> <p>Vacant sites may be vulnerable to misuse and anti-social behaviour creating problems for local residents.</p>	<p><b>NEGATIVE</b></p> <p>There is potential for disruption to all neighbouring residents during demolition and construction phases.</p> <p>For example noise and issues of dust and access may have a higher impact on people with disabilities.</p> <p>Whilst properties are being emptied and before they are demolished, there is potential for squatting and antisocial behaviour.</p> <p>Vacant sites may be vulnerable to misuse and anti-social behaviour creating problems for local residents.</p>	<p>The potential for meanwhile spaces to be used positively for community benefit while work is awaited will be explored.</p> <p>All contractors will need to adhere to the Considerate Constructors Scheme to minimise disruption to residents, ensure sites are safe and healthy and make arrangements to ensure access to properties.</p> <p>Noise levels will be controlled and limited to certain times of the day.</p> <p>Dust levels will be minimised through the use of specialist equipment on site.</p> <p>Adequate footway space</p>

	<p><b>POSITIVE</b></p> <p>The potential for meanwhile spaces to be used positively for community benefit while work is awaited will be explored.</p>	<p><b>POSITIVE</b></p> <p>The potential for meanwhile spaces to be used positively for community benefit while work is awaited will be explored.</p>	<p><b>POSITIVE</b></p> <p>The potential for meanwhile spaces to be used positively for community benefit while work is awaited will be explored.</p>	<p>will be given for all pedestrians whilst works are being undertaken.</p> <p>Road closures will be kept to a minimum and within prescribed hours.</p> <p>Uneven footway surfacing and damage to roads resulting from site works will be repaired.</p> <p>Where properties are likely to be empty for a significant period prior to demolition, temporary occupation should be considered to avoid squatting or anti-social behaviour.</p> <p>Meanwhile uses should be considered for sites vacant between demolition and construction. This will deliver local benefits to</p>
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				the area and minimise anti-social behaviour and negative uses.
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Table 2 Assessment of impact and outcomes

## 7. Equality Impact Assessment Action Plan

Issues identified and groups affected	Actions to be taken	Timescales for action	Who is responsible for delivery	Performance measures	Reference to services or other plans
All groups	<p>No protected groups are identified as being disadvantaged by the proposal.</p> <p>A programme of consultation and engagement with residents to inform the review of housing options will be undertaken.</p>	<p>A public meeting with residents will be held prior to the publication of the Cabinet recommendations.</p> <p>If the Cabinet report recommendations are accepted a programme consultation and engagement will be drawn up.</p>	Head of Regeneration.	<p>Production of a Consultation and engagement programme.</p> <p>Completion of review of options.</p> <p>Ongoing monitoring of decant and buy-back programme.</p>	<p>The delivery of new homes at social rent is a Mayoral priority that will help to address the housing crisis in Newham.</p> <p>Regeneration at Carpenters Estate will form an important part of the Council's wider strategic Housing Delivery Plan [as outlined in the Housing Delivery Statement approved at Cabinet on 15th November 2018</p>

## **8. Conclusion**

This EqlA has been undertaken to analyse how recommendations to Cabinet in December 2018 would impact on residents of Carpenters Estate

Table 1 provides an assessment of the project's relevance to each category and provides demographic information as supporting evidence. To summarise; consulting and engaging with the community; ceasing the current Joint Venture procurement; continuing with the decant programme and reviewing regeneration options for delivering the largest number of socially rented properties on the Carpenters Estate will provide a positive impact across all equality groups through the potential for: improved housing (including genuinely affordable homes) and public realm; enhanced connections to the surrounding areas; potential re-provision of the Carpenters Primary School; a potential for an improved and larger Building Crafts College providing training opportunities and potential for commercial space providing job opportunities.

However socio-economic disadvantage groups, age and disability are the characteristics assessed as being the most impacted by the regeneration programme. Table 2 assesses the potential negative impact and sets out the outcomes, recommendations and mitigation measures for these groups that are either in place or will be implemented.

Extensive consultation has been carried out over a number of years about the redevelopment of Carpenters Estate. The recommendations in the Cabinet report put residents currently on the estate and beyond at the heart of the regeneration and consultation and engagement will be ongoing.

The Project Team will treat this document as live and will be responsible for assessing and updating the EqlA implications throughout the programme lifecycle. For further information about the Carpenter Estate redevelopment please visit [www.newham.gov.uk/carpenters](http://www.newham.gov.uk/carpenters) or call the regeneration team on 020 3373 1443.

## **9. Formal agreement**

Head of Regeneration

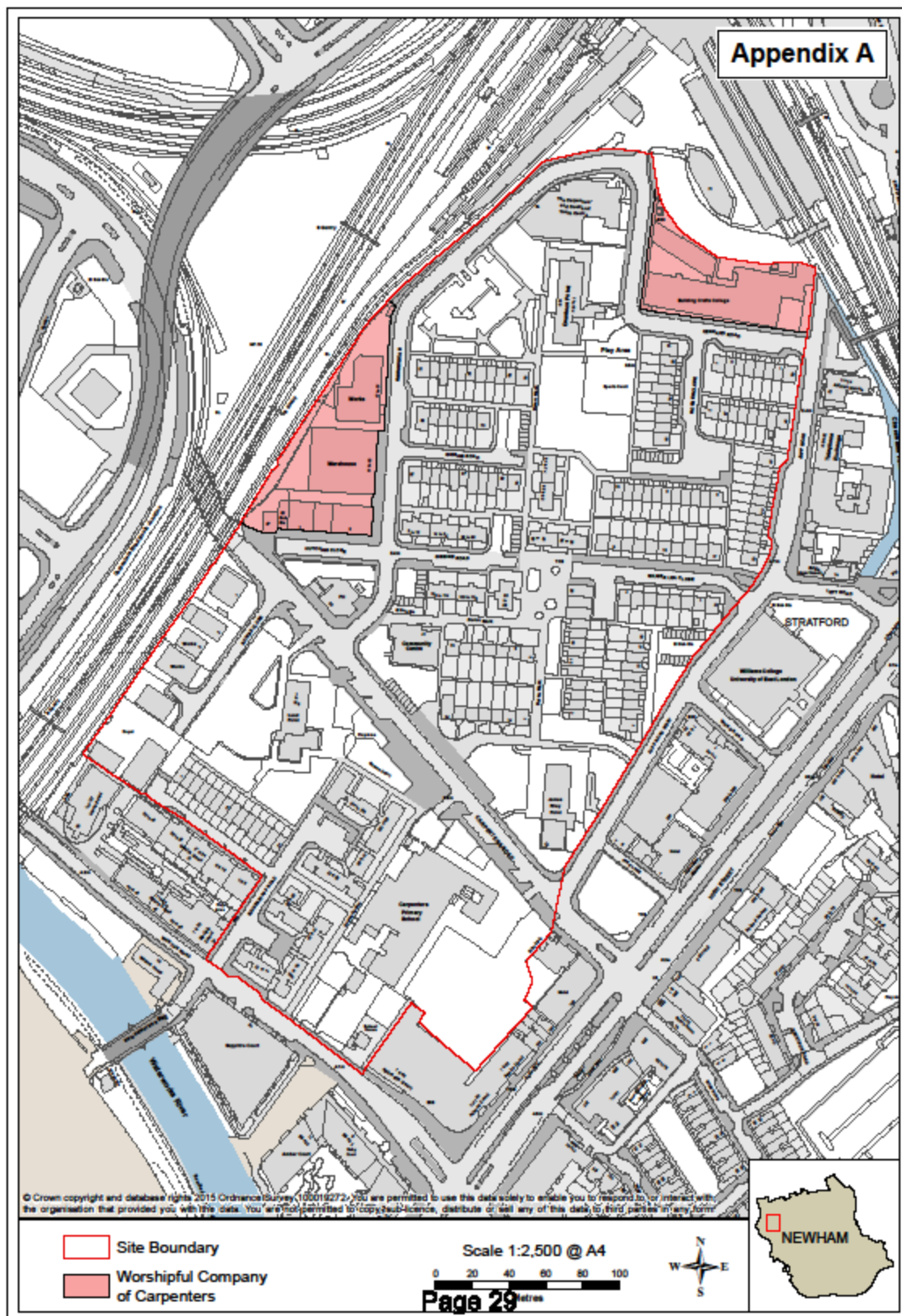
## **10. Publication of results**

This EqlA was published on 26 November 2018 alongside the Cabinet report updating on the Joint Venture procurement.

## **11. Monitoring and review**

Performance measures are set out in Section 7 and will be monitored. The EqlA will be reviewed periodically.







## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	<b>Newham Local Plan: Adoption</b>	
<b>Date of Meeting</b>	<b>4 December 2018</b>	
<b>Lead Officer and contact details</b>	<b>Sophie Donaldson, Policy Manager</b> <b>Tel No: 0203 373 2620</b> <b>Email: Sophie.Donaldson@newham.gov.uk</b>	
<b>Director, Job title</b>	<b>Elaine Elkington</b> <b>Interim Director of Regeneration and Planning</b>	
<b>Lead Member</b>	<b>Mayor Fiaz, Lead Member for Regeneration, Planning and Housing Delivery</b>	
<b>Key Decision?</b>	Yes	Reasons: Affects more than one ward.
<b>Exempt information &amp; Grounds</b>	No	Grounds: N/A
<b>Wards Affected</b>	All wards – Excluding LLDC planning functions area	
<b>Appendices (if any)</b>	Appendix 1: Newham Local Plan (2018) Appendix 2: Inspector's Report to the Council on the Examination of Newham's Local Plan Review (26 <sup>th</sup> November 2018).	

#### 1 Executive Summary

- 1.1 To ensure that Newham's Local Plan continues to provide a robust and up-to date framework (in accordance with Reg10A of the TCPA (Local Planning) 2012) for shaping the future development of the Borough, a Local Plan review (LPR) has revisited the existing strategic vision, policy objectives and site allocations contained within adopted Local Plan documents.
- 1.2 Following extensive public consultation and an independent Examination by the Planning Inspectorate on behalf of the Secretary of State (SoS) that has found the document to be 'sound', Cabinet, is asked for its agreement to proceed to Full Council seeking formal adoption of the updated Local Plan as part of the Development Plan for the Local Planning Authority area (i.e. excluding the LLDC area).
- 1.3 This will ensure investment certainty within the Borough, helping to bring forward development to best effect and will further improve the Council's Planning Service by providing a clear, up-to-date, robust and streamlined policy framework that is less likely to be subject to successful challenge.

## **2 Recommendations**

- 2.1 For the reasons set out in the report and its appendices, Cabinet, is asked to:
- 2.1.1 Note that the Planning Inspector has found Newham's [updated] Local Plan to be 'sound' subject to the incorporation of a number of amendments; and,
- 2.2 Endorse and make the following recommendation to Council:
- 2.2.1 Approve the [updated] Local Plan for adoption as part of the Council's Development Plan, and
- 2.2.2 Agree to formally withdraw Newham's Core Strategy (2012) and Detailed Sites and Policies DPD (DSPDPD, 2016); and,
- 2.2.3 Delegate authority to the Interim Director of Regeneration and Planning following consultation with the Mayor, as Lead Member for Regeneration, Planning and Housing Delivery, to:
- finalise and approve the publication version of the Local Plan
  - finalise and approve the Adoption Statement, submitting it to the Secretary of State; and
  - approve uploading of the Local Plan and accompanying documents to the Council's website.

## **3 Background**

- 3.1 Newham's existing adopted Local Plan (2012-2017) comprises a suite of development plan documents that together provide a framework to shape the future development of the Borough, ensuring that the benefits of growth and regeneration are fully harnessed in accordance with the Council's corporate agendas.
- 3.2 These documents incorporate the strategic vision - which centres on creating a mixed use borough that meets the needs of the population - translated into spatial and thematic policies, including Strategic and non-strategic site allocations (where particular kinds of development are promoted) and designations (protections).
- 3.3 Local Plan documents are typically considered to become 'out of date' 5 years from their date of adoption. To ensure that planning policies remain robust and up-to-date and that opportunities to positively effect change are maximised, the Council has spent approximately 2 years undergoing a Local Plan Review (LPR) on two key adopted development plan documents, the Local Plan: Core Strategy (2012) and the Local Plan: Detailed Sites and Policies DPD (2016), combining them into one consolidated document as part of the process.
- 3.4 In addition to numerous informal processes of stakeholder consultation, two stages of statutory public consultation took place in 2017/18 following approval by the Mayor in consultation with Cabinet on 16.02.17 and 21.11.17. On 26.02.18, Full Council agreed the content of a Submission draft [updated] Local

Plan, granting permission to submit to the Planning Inspectorate for Independent Examination on behalf of the Secretary of State (SoS).

- 3.5 The draft [updated] Local Plan Examination process commenced on 27<sup>th</sup> February 2018, upon submission of the document to the Planning Inspectorate.
- 3.6 Over a number of months the Examination process has involved correspondence between the Council and various stakeholders (including statutory consultees, land owners, developers etc.) surrounding the content of the Plan and associated documents.
- 3.7 As part of the process, Public Examination Hearings also took place from 19<sup>th</sup> to 28<sup>th</sup> June 2018. As is usual for a Local Plan Examination, a number of modifications to the Plan to address concerns of soundness were proposed by the Council and the Inspector during this time. These and other minor modifications (largely to provide clarity) were not considered to affect the overall strategy set out within the document and a public consultation on the changes, on behalf of the appointed Inspector, took place between July and Sept 2018.

#### **4 Key Considerations & Proposals**

- 4.1 The Inspector's Report marking the close of the Independent Examination on the [updated] Local Plan, was received by the Council on 26<sup>th</sup> November 2018. The report concludes that subject to the inclusion of recommended Main Modifications consulted upon, that the Local Plan is 'sound' and acts as an appropriate basis for planning within the Borough (see Appendix 2 for Report and details of the Main Modifications).
- 4.2 As such, this confirms that policies and allocations contained within the Plan have been positively prepared and that they are justified (backed by appropriate evidence), effective and consistent with national policy.
- 4.3 The Report also confirms that the Council has met all of the legal requirements of the plan-making process to date, and that it has adequately discharged its responsibilities under the Duty to Cooperate.
- 4.4 Having reviewed existing policy objectives and site allocations of the Core Strategy and DSPDPD, the updated Local Plan responds to new opportunities and threats through the identification of a number of new site allocations/designations across the Borough. Moreover, it provides a combined suite of updated/ amended policies having considered areas that require strengthening, particularly where there have been changes in the development context since the adoption of the previous plan, including changes to higher level (national and regional) policy. Overall, this has resulted in a Plan that:
  - allocates 30 mixed-use strategic sites – some new, some amended - to promote sustainable (Good) growth where infrastructure accompanies housing and jobs;
  - amends housing policies to inter alia, update the overall housing target for the Borough to 43,000 homes between 2018 and 2033, and to ensure a continued supply of good quality housing of various types, sizes and

tenures to meet need, maximising the benefits of development for residents (notably affordable housing yields) by acknowledging the change in market conditions, and recognising emerging products (such as the purpose-built Private Rented Sector market);

- further promotes economic growth, through the identification of a limited amount of employment land for release, whilst maintaining an adequate reservoir of sites and land to deliver jobs and business growth to accommodate projected demand;
- considers new growth sectors (such as that of the cultural and night-time economy) and clearly defines the scale of ambition in terms of access to employment that developers are expected to support;
- recognises of the significant need for healthcare and education provision via the allocation of a number of sites for social infrastructure use;
- reinforces the importance of green space, heritage assets, retail networks and other important assets;
- provides an updated spatial strategy to manage the location of tall buildings;
- updates environment and amenity policies; and
- reviews any existing allocations (both large scale strategic and non-strategic) to recognise any changes in context.

4.5 A summary of the Main Modifications incorporated into the Plan, is listed below. Main Modifications are set out in full in Appendix 2.

- A commitment to an early review of the Local Plan, subject to the publication of the final (revised) London Plan significantly amending housing targets.
- The incorporation of policy to set the requirements for, and details of, masterplanning considerations on strategic and other major sites, inclusive of clarifications pertaining to how future infrastructure requirements should be considered on certain sites.
- A clarification to specialist accommodation policy to specifically reference how quality standards should be ensured for (non-nomadic) Gypsy and Traveller accommodation. - Additions to supporting text and glossary to provide clear definitions of terms pertaining to employment land policy (e.g. employment-led, managed release of employment land etc.) and other key principles at the heart of the Plan's strategy.
- The inclusion of a 'stepped' housing trajectory, with a varied housing target over the first, second and third 5 year tranches of the Plan (as part of delivering 43,000 new homes over the 15 years).
- Clarifying, promoting and setting the parameters for an 'Agent of Change' approach to new development.
- Clarifications to ensure Sustainability & Climate Change and Infrastructure policies are effectively implemented as intended.
- Introducing adequate avoidance and reduction measures to ensure that adverse effects on the integrity of European sites (notably Epping Forest SAC) are excluded (see paragraph 8.4.3 and 8.4.4 below).

- Amendments to indicative building heights on a limited number of strategic sites, in some cases recognising additional opportunities available or the need to further safeguard local heritage.
- 4.6 In addition, a number of minor modifications were made to the document as part of the Examination process, mostly to introduce further clarity, ensure consistency or correct minor editorial errors.
  - 4.7 Finally, there have been further minor amendments made to the document post Examination including minor text, format and presentational changes.
  - 4.8 Whilst the Independent Examination stage has reached a close, the Planning Inspectorate makes it clear that it is at the Council's discretion as to when to adopt the Plan, but that it will not gain full weight in the planning process until this occurs. As such, it is requested that the document be approved for adoption without delay, allowing it to gain full weight in the decision making process to achieve the benefits set out in Section 5 below.
  - 4.9 The Newham Core Strategy 2012 is out of date. Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review Local Plans at least once every 5 years from their adoption date, to ensure that policies remain relevant and effectively address the needs of the local community. Moreover, recent legislation provides the Government with the right to intervene and write a Local Plan (or designate a third party to do so) on behalf of the Local Authority where an up to date adopted plan is not forthcoming.
  - 4.10 Further, Local Planning Authorities must keep their 5 year land supply up-to-date to ensure control of development within their authority area. When a plan is considered to be out of date, the National Planning Policy Framework's 'Presumption in Favour of Sustainable Development' is relevant, stating that planning permission should be granted.
  - 4.11 As a document that is less than 5 years old, an adopted [updated] Newham Local Plan would be less likely to be subject to successful challenge, reducing the risk of planning decisions being made outside of the Local Authority's control e.g. appeals being upheld. In progressing the Local Plan it is however noted that emerging national and regional (London Plan) planning policy may result in the need to undertake an early review of the Local Plan (within the 5 year period after the adoption of this document). This however would carry considerably less risk than delaying the Plan's adoption which could result in substantial costs from recommissioning evidence base that is deemed out of date, as well as missed opportunities to provide investment certainty through failing to update the existing policy framework.

## **5 Policy Implications & Corporate Priorities**

- 5.1 Once adopted, the updated Local Plan will enable Newham Local Planning Authority to secure net gains across the economic, social and environmental objectives of the Council; providing a clear, up to date, robust and streamlined policy framework for shaping future development in Newham.
- 5.2 Moreover, its adoption will serve as a pro-active response to emerging development opportunities, providing investment certainty that ultimately yields Council Tax, Community Infrastructure Levy, New Homes Bonus and Business

Rate receipts, plus affordable housing and other infrastructure through S106 agreements, capturing the associated benefits of growth and regeneration for the benefit of Newham's residents.

- 5.3 The [updated] Local Plan supports Mayoral Pledges through seeking to deliver new homes, improve environment quality - through various policies including one dedicated to Air Quality – and to secure economic benefits for residents via business growth and job opportunities.
- 5.4 Upon adoption the document will replace the adopted Core Strategy (2012) and DSPDPD (2016). The Policies Map (2016) that accompanies those documents through a spatial representation of policy will also be updated by a Policies Map (2018).

## **6 Alternatives considered**

- 6.1 No alternatives have been considered because the Council seeks to comply with legislation, ensuring the production of an up-to-date plan. Alternatives were however, considered earlier in the process (as Issues and Options stage) where a 'do nothing' and other options were discounted as less beneficial.

## **7 Consultation**

- 7.1 **Name of Lead Member consulted: Mayor Rokhsana Fiaz. Position: Lead Member for Regeneration, Planning and Housing Delivery Date: 3 July 2018, 13 August 2018, & 1 and 21 November 2018.**
- 7.2 In addition the consultation referred to in 7.1., consultation with the lead member also previously occurred at multiple stages of the document's production and 5 meetings of the Local Plan Review Members' working group have informed the document's drafting. Public consultation, which likewise shaped the document as detailed in the Consultation report, is detailed in paragraph 3.3.
- 7.3 A public consultation also occurred at the Inspector's request on proposed Main and minor modifications to the plan and accompanying HRA following discussions at Examination Hearings (see para 3.4); this occurred for 8 weeks from July to September 2018. Representations received, a summary and where relevant, a brief response were passed to the Inspector to help inform his report as well as published on the Council's website.
- 7.4 It is noted that a petition has been presented to Full Council concerning amendments to local centre boundaries. It is noted that these cannot be changed at this stage. The Inspector has concluded that the final town centre policies and the associated community facilities policy relating to Places of Worship (POW) are comprehensive and promote social cohesion with no soundness issues raised.
- 7.5 However, as stated one of the Main Modifications is to commit to an early review of the Plan, at which point detailed issues can be revisited in the light of development on adjacent sites.

## **8 Implications**

### **8.1 Financial Implications**

- 8.1.1 The cost of Examination and associated processes (not inclusive of Officer resource) was considered by Cabinet on 21 November 2017. The cost to date is £225,448. This is likely to rise to c. £250,000, taking account of the anticipated costs of the work of the Inspector following Examination hearings.
- 8.1.2 There is existing budget provision from within Planning Services to cover the additional anticipated Inspector's costs in 2018/19.

### **8.2 Legal Implications**

- 8.2.1 It is a statutory requirement for the Council to have a Local Plan in place and to ensure it is relevant. The statutory provisions under which a Local Plan is made are within the Planning and Compulsory Purchase Act 2004 (as amended) and regulations made under the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environment Assessment of Plans and Programme Regulations 2004.
- 8.2.2 Officers advise at paragraph 4.1 that following an Examination an initial report dated [26.11.18] from the Inspector found that subject to the consultation and inclusion of recommended Main Modifications, the [revised] Local Plan has been found to be 'sound' and forms an appropriate basis for planning within the Borough.
- 8.2.3 Officers advise at paragraph 7.3 that consultation occurred from July to September 2018 on the main modifications as requested by Inspector and minor modifications as suggested by the Council. The responses were passed to the Inspector for consideration as part of his report, but were mostly supportive or suggestive of minor amendments to the proposed amendments.
- 8.2.4 The correct procedure has been followed to date to enable the Council to progress the Local Plan to this final stage for adoption as the requirements of the Planning and Compulsory Purchase Act 2004 (PCPA) and the Town and Country Planning (Local Planning) (England) Regulations 2012 have been met.
- 8.2.5 In the event that the recommendations requested in this report are approved by Cabinet and Full Council then officers outline that the Council will follow the procedure set out in Town and Country Planning (Local Planning) (England) Regulations 2012, which include preparation of an Adoption Statement and submission of the Adoption Statement to the Secretary of State and parties that requested to be notified of the adoption of the Local Plan.
- 8.2.6 Following this, the Local Plan is fully adopted and full weight attached to the policies, such as in the determination of planning applications and appeals as included within the requested recommendations in this

report. The Local Plan is then to be uploaded onto the Council website and copies placed at appropriate locations within the Borough.

- 8.2.7 It is considered that the correct procedure has been followed in the review of the Local Plan and that the recommendations in this report should be agreed with the Local Plan being adopted in order to provide a planning benefit to the wider borough.

### **8.3 Equalities Implications**

- 8.3.1 The Council has a public duty under the Equality Act 2010 to consider the impact of its decisions in terms of promoting and ensuring equality and cohesion across the different types of equality strands: age, sex, ethnicity/race, disability, sexual orientation, religion/belief, transgender and relating to pregnant and breastfeeding women.
- 8.3.2 An Equalities Impact Assessment was carried out as a part of the preparation of the existing Local Plan documents. Having already assessed the principles of the Plan, a further EqIA has been undertaken (subsumed within an Integrated Impact Assessment document - IIA) to address any additional considerations arising from any of the policies or allocations or the plan as they have emerged, testing proposals against identified checkpoints.
- 8.3.3 This process has ensured that the proposals are cognisant of possible equalities impacts maximising their positive impact as part of planning for the whole community and avoiding or mitigating any negative impacts.
- 8.3.4 This process was carried forward on an iterative basis as plan preparation progressed and was finalised on submission of the draft Plan to the Inspectorate (see para 3.4).
- 8.3.5 Cabinet members should also be mindful of the Council's duties under the Human Rights legislation. The planning officers have confirmed that the provisions of the Human Rights Act 1998 have been taken into account in the preparation of the Local Plan and the preparation of this report.

### **8.4 Other Implications relevant to this report:**

- 8.4.1 The wider IIA – which in addition to an EqIA includes a Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA) - has undertaken a systematic assessment of the options against wider sustainability objectives, a process which serves to highlight the importance of maintaining many of the existing policies to plan for the full range of needs (social, economic, environmental) as well as carefully framing site allocations to address site-specific issues.
- 8.4.2 As modifications to the Local Plan made during the Examination stage did not alter the strategy or intent of the document, changes did not require further SA or EqIA work to be undertaken prior to adoption.
- 8.4.3 The HRA portion of the IIA however, has been subject to further work



during the Examination period in light of representations from Natural England regarding revised guidance in light of the Wealdon judgement, and subsequently the April 2018 European Court judgement, *People over Wind & Sweetman v. Coillte Teoranta*. This required further consideration assessment in-combination effects on Natura2000 sites in the UK, (in particular, Epping Forest) particularly in regard to air quality and recreational impacts, requiring some minor clarifications to policy.

- 8.4.4 This HRA and resultant plan modifications were produced in close collaboration with Natural England, with input from a specialised QC, and was the subject of a Statement of Common Ground agreeing that it satisfies the associated legal requirements in relation to Local Plan preparation, whilst noting an ongoing intention during implementation to co-operate with Natural England and other stakeholders to investigate further in-combination and cumulative effects of development on Epping Forest SAC. It was consulted on during the 'Modifications' consultation with no representations received on it.

## **9 Background Information used in the preparation of this report**

9.1 See appendices

9.2 Consultation Report, February 2018

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# Newham Local Plan 2018

A 15 year plan looking ahead to 2033

For adoption, interim version  
26<sup>th</sup> November 2018

## About the Local Plan

This Local Plan combines and updates the Borough's previous Core Strategy (2012) and Detailed Sites & Policies DPD (2016). At the time of adoption (December 2018) Newham's Local Plan also comprises the separate Joint Waste Plan (2012) and Gypsy and Traveller Accommodation DPD (2017).

The Local Plan is the result of over two years' worth of evidence-gathering and consultation, notably two formal stages of public consultation ('Issues & Options' in Spring 2017, and 'Proposed Submission' in Winter 2017/18), a further two stages of formal but targeted consultation (Integrated Impact Assessment Scoping stage and Main/Minor Modifications Consultation following examination hearings) and a range of less formal engagement research including workshops with a Members' Steering Group, activities at the Newham Show, engagement with the Youth Council, and analysis of wider Council research including corporate surveys.

Key pieces of evidence for this plan are indicated on page 5 and are referenced within policies as relevant; all studies are on our [website](#). For further information on the engagement and consultation work that went into updating the plan (including a 'you told us, so we...' summary) please refer to the [Statement of Consultation](#) submitted as part of the examination process and the summary leaflet [here](#).

To participate in future planning document consultations, please add yourself to our Stakeholder Database by following instructions [here](#). For information about how you can engage in planning processes in Newham more generally, please refer to the latest iteration of our Statement of Community Involvement, available via the Council's Local Plan [pages](#).

For a guide that shows how policies from previous versions of Newham's Local Plan have moved / changed, please refer to the table at the end of this document (Appendix 4).

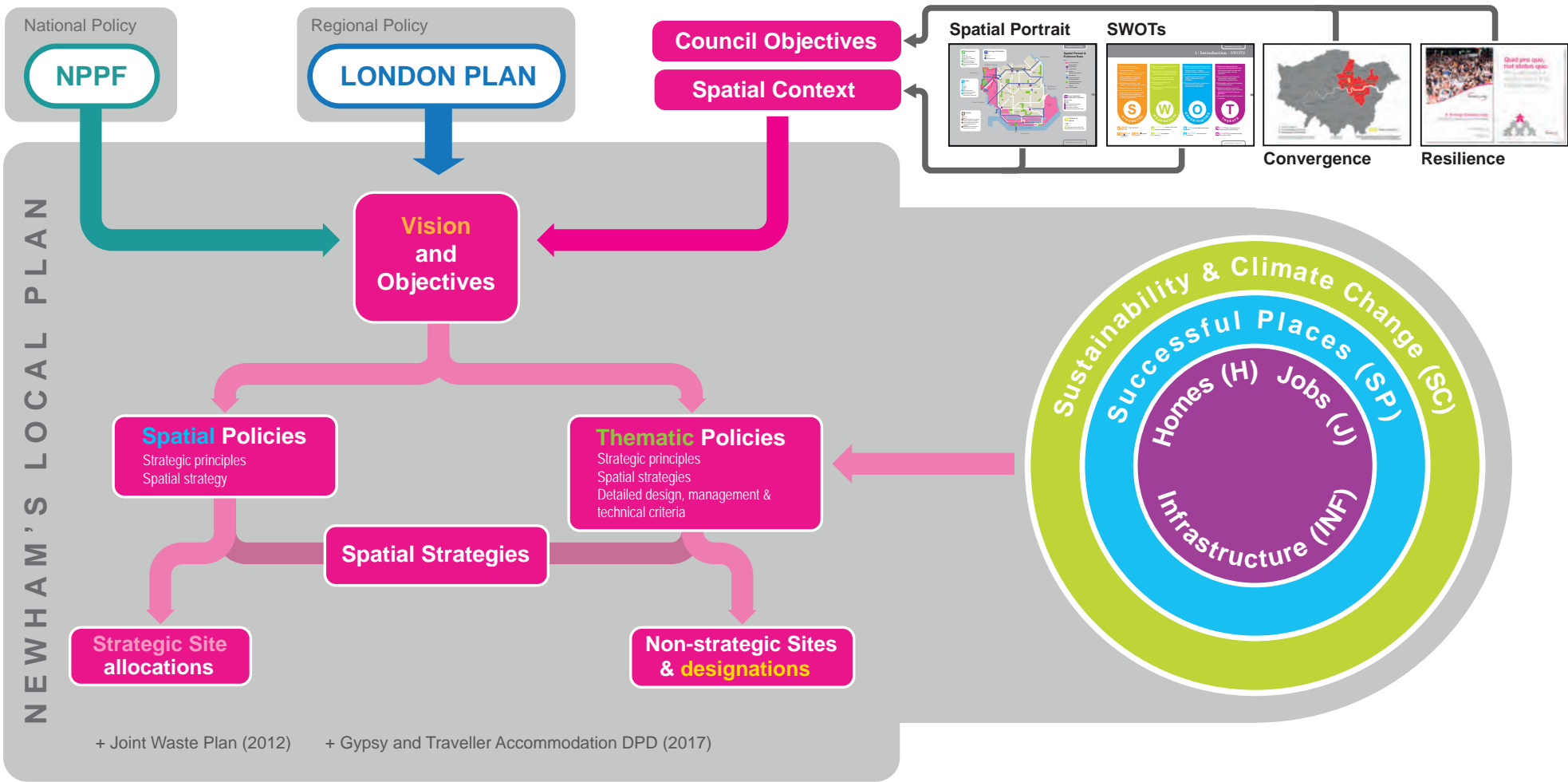
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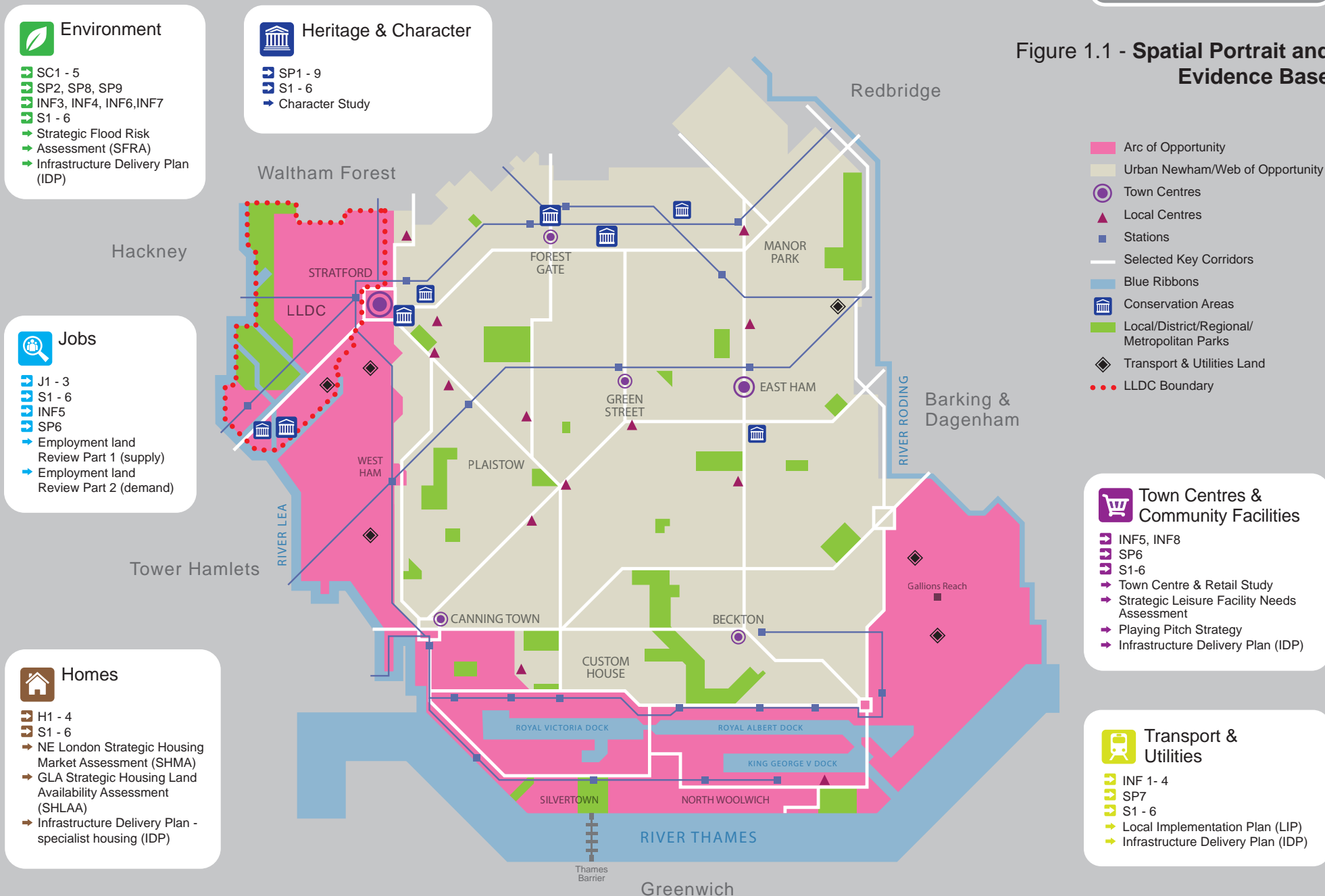
# 1 | Introduction - How the Plan Works

**The Plan needs to be read as a whole:** vision - based spatial policies and associated Strategic Site allocations together with thematic policies and related designations and complementary non-strategic site allocations (smaller sites), and alongside other Local Plan, London Plan and National Policy documents. In doing so it sets out the framework for how homes, jobs and infrastructure will be delivered to create successful places that are sustainable, particularly in light of climate change.



\ Proposal assessment = NPPF + London Plan + Local Plan (S1 + Sn + SPn / Jn / Hn / SCn / INFn as applicable)  
 • For the purposes of Neighbourhood Planning, the strategic component of each policy is set out at the end of each policy.

Figure 1.1 - Spatial Portrait and Evidence Base



# 1 | Introduction - SWOTS Analysis

- Road, rail, tube, river and air connections with the rest of London and beyond
- Newham is now 'on the map' post 2012 with world class sporting, office, parkland, conference, industrial, airport, retail and housing developments
- Youthfulness, diversity and degree to which people get on well
- Strong Entrepreneurial culture
- Improving rates of educational attainment and economic activity with successful mechanisms connecting people with jobs and business opportunities





 **2000+** new businesses each year

 **47.6%** of population under 30  **80+** languages spoken

- High rate of population churn and net out migration
- High levels of multiple deprivation with knock on effects for the local economy and support resources
- Employment continues to be dominated by lower paid jobs
- Flood risk and legacy of contamination
- Barriers to connectivity: rivers and infrastructure




 **40%** of Wards are in the 10% most deprived in England

 **14.9%** population migrated either into or out of the Borough in 2016

- Extent of assembled development land, infrastructure investment and design scrutiny : scope to transform places and life chances
- Attractive riverfront and dockside locations and new Crossrail stations, Enterprise Zone subsidies
- City moving East as connections improve and inner London becomes less affordable




 **492ha** of allocated development sites

 **30.5 km** of riverfront and dockside

- Scale and speed of growth compared with employment and infrastructure lead in times and constrained public service resources
- Loss of family sized homes to conversions, new supply dominated by smaller units
- Affordability reducing for housing and small business
- National emphasis on house building and green belt protection displacing jobs and forcing up densities
- Congestion and air quality impacts of growth



 **12.09** ratio of house price to (lower quartile) gross earnings

 **4 months** exceeded average NO<sub>2</sub> limits in 2016



# 1 | Introduction - Key Objectives

	Overarching objective	Key points	Informs policies
1	<b>Optimise development opportunities in ways that benefit new and existing communities</b> - achieving convergence and resilience	<ul style="list-style-type: none"> <li>Activating and otherwise realising or reinforcing the value of assets to best effect at various scales - this is distinct from 'maximising development'</li> <li>Using development to address existing weaknesses and threats to communities (examples include flood risk, poor employment prospects, lack of affordable housing and infrastructure deficits)</li> <li>Harnessing growth and connecting people to opportunities arising from development in ways that ensure residents across Newham enjoy the same opportunities, access, health, prosperity and quality of life as other parts of London and the UK and individuals, communities and places can better weather hard times and change</li> </ul>	S1-6 J1-3 H2 SC3 INF1-9
2	<b>Create high quality places and stable, mixed and balanced communities</b> where people choose to live, work and stay	<ul style="list-style-type: none"> <li>Delivering high quality safe and secure places that offer people choice to meet their needs over the course of their lifetime and changing circumstances, while preserving and enhancing Newham's distinctiveness</li> <li>Reducing population churn and creating cohesive communities where people have a stake in the future of the borough</li> </ul>	S1-6 SP1-9 H1-4
3	<b>Deliver good growth</b> – through mixed use, sustainable development that provides for quality housing, jobs and physical, green and social infrastructure	<ul style="list-style-type: none"> <li>Ensuring that growth (i.e. in housing numbers and population) is supported by sufficient infrastructure and jobs</li> <li>Ensuring growth is not at the expense of the environment and resources and achieves changes in behaviour which are more sustainable, addressing cumulative impacts</li> <li>Ensuring homes are not delivered at the expense of jobs and that quantity does not compromise quality</li> </ul>	S1-6 SP1-9 SC1-5 INF1-9
4	<b>Balance Newham's local and strategic roles</b> in meeting jobs, business, infrastructure and housing needs	<ul style="list-style-type: none"> <li>Whilst recognising the strategic roles Newham plays within London, it is important that the full range of local needs and issues are addressed as well as an element of strategic need</li> <li>Acknowledging that certain strategic roles can have local benefits and help meet local needs, but that sometimes, local needs have to be prioritised</li> </ul>	S1-6 J1, J2 H1, H2, H3 INF1-5, INF8

# 1 | Introduction - Envisioning Newham in 2033

## Growth



43k New Homes



60k New Jobs



49k Additional Residents

There's a wide choice of shops on my doorstep, great bars and restaurants and all sorts of events throughout the year. I used to go to Oxford Street and the West End, but now I don't need to.

I feel like Newham used to get a lot of bad press, particularly in terms of housing. But these days people move here from all over London, including those who are coming back to where they grew up. I'm proud to say I live in Newham.

I live in the north of the borough, and all the stuff going on in the south seemed so far away from me. But now transport links have been improved, everything seems so much closer. I've just got a job in one of the new offices with the help of Workplace and travelling to work is easy.

The new development in the area has been great for my business. The town centre now has an environment to match its stylish shops and more places people want to visit, stay for longer and spend more. It's allowed me to improve my shopfront and renovate our home.

I recently downsized. Luckily, I didn't have to move far, so I'm still close to friends and family. My new home was wheelchair accessible so I didn't have to make any adjustments. I can easily move around outside too – there are now lifts at every station and less clutter, traffic and pollution on the streets.

You can really see the benefits of the investment in making it easier and more pleasant to walk and cycle. I used to drive to work, but now I cycle. I'm fitter and the air quality seems to be improving.

I'm doing my A levels at a local college. It has great links to big and small local employers to help give me the relevant experience needed to get a job. I'm ambitious but also want to stay close to my family. The fact that I can easily access work and save to buy my own home in the local area is very important to me.

We don't need our own car anymore; our garage is now a play space for the kids and we've turned the front garden back into a garden.

# 1 | Introduction - Envisioning Newham in 2033

What's great is the choice, there's something for everyone. Whether you're talking homes, jobs, entertainment or sport, I like that there's something different to do and see in every direction and you're always meeting different people and learning new things.

Our toilet is flushed with rainwater and the sun makes the lights work. My school has a playground up high on the roof and on the way home I can go to three parks with different things in them.

There is so much on our doorstep. It's amazing to have a park that links to Stratford and Queen Elizabeth Olympic Park all the way down to the Royal Docks and Thames, with loads of interesting things to see on the way. There are iconic buildings old and new, wildlife, and plenty of things for the kids to enjoy.

I've been told this area was a barren wasteland until ten years ago. Now it's turning into a piece of city bit by bit, with everything you need including a new town centre, parks and station. – I feel like it's finally a place in its own right as well as part of something bigger.

I am opening our new manufacturing plant in the Royal Docks. Our investors can see it has accessibility, connectivity, and is part of a growing cluster of similar businesses, services, higher education and research that will make it a success.

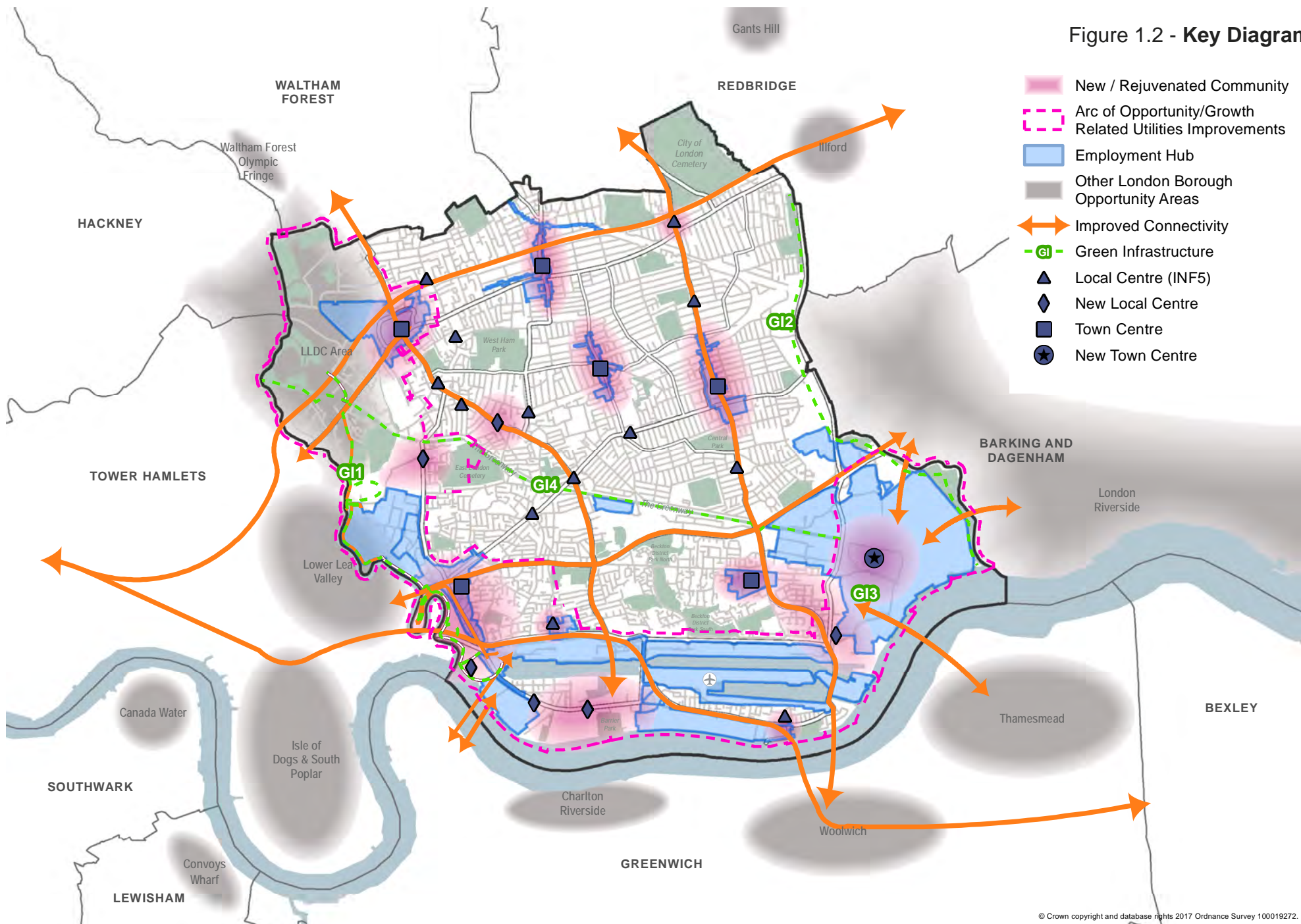
My son's school is nearby and provides a great environment for him to fulfil his potential. I can also get support at the local community centre, which shares a building with the GP and library – all really modern and inviting.

Having a fast, reliable and well designed bus network is a great help for me going about my day. It makes it easier for me to drop my toddler off at nursery, get to work, do my shopping, get to college in the evening and go to parks and events at the weekend.

Our small firm provides services across London so it made perfect sense to take advantage of Crossrail, more affordable rent and new business space and move to the edge of the town centre. We've cut back on the number of vans we use, while our business has grown.

All this space between here and the North Circular used to be totally inaccessible, now it's like we've got a giant back garden to enjoy.

Figure 1.2 - Key Diagram





# S1 Spatial Strategy and Strategic Framework

Proposals that address and where appropriate accord with the following over-arching strategic principles, vision based spatial strategy and design and technical criteria will be supported:

## 1. Strategic Principles

- a. Securing transformational change for the borough and its residents with the overriding priority to build and reinforce communities and places that work and to ensure that growth contributes to achieving convergence and personal and community resilience, with new and existing communities, jobs, homes, services, spaces and facilities well integrated in connected, distinctive, successful, quality places;
- b. Realising the potential and making best use of Newham's land, green space, blue ribbon network and heritage assets, connectivity, existing and emerging economic strengths, working to enable the delivery of at least 43,000 homes and 39,000-60,000 jobs between 2018 and 2033 to place Newham at the heart of London's march eastward and its global presence;
- c. Higher density, genuinely mixed use, context sensitive development will achieve good growth, creating and sustaining new and rejuvenated inclusive, stable, healthy, mixed and balanced communities where people choose to live, work and stay and a borough where homes are not created at the expense of jobs, environmental and housing quality, provision and protection of family housing, or liveable scales of development, where employment uses can sit comfortably with housing and supporting services and do not undermine town and local centres and where population growth is accompanied by jobs growth and timely delivery of supporting physical, social and green infrastructure, including that to address existing deficits and cumulative impacts;
- d. Keeping Newham Moving through promoting a significant modal shift towards active modes of travel and public transport and ensuring appropriate investment in the quality and connectivity of its strategic and local route and communications network (road based and otherwise; and
- e. Enabling Newham to become cleaner and greener, achieving sustainable development through all scales of development by maximising integration of green infrastructure, and other sustainable design, technologies and management techniques, including innovative approaches to energy requirements, air quality and flood risk and waste management.

## 2. Vision based spatial strategy

- a. The greatest opportunities for change will come forward within the Arc of Opportunity which will be the primary focus for new job creation, infrastructure development, new town and local centres, carefully located tall buildings at public transport nodes, and the vast majority of new housing on large sites in Beckton, the Royal Docks, Canning Town and Custom House, West Ham and Stratford, reconnecting residents with the rivers and docks;

- b. Urban Newham will see more incremental and smaller scale change in a 'Web of Opportunity' focused on Town and Local Centres and Crossrail stations but will benefit from new development in the Arc and elsewhere through investment and improved connectivity within the borough (notably north-south) and beyond (notably across the Thames and across London) and comparable attention to design quality, including carefully placed taller buildings, with wider neighbourhoods strengthened according to their particular character, assets and opportunities, making creative use of small spaces, redevelopment opportunities and retrofitting;
- c. Successful mixed use areas will emerge and be sustained, notably in town centres, LMUAs and on Strategic Sites, and at a smaller scale particularly associated with social infrastructure investment;
- d. A major but managed shift from traditional industrial activity will be achieved on Strategic Sites and LMUAs and more broadly along the Lower Lea Valley and in the Royal Docks Enterprise Zone towards employment uses in emerging growth sectors such as high technology and creative industries, night time, visitor, retail, leisure and cultural economy, business and financial services, making best use of heritage and other assets in the area;
- e. Heavier industrial uses, warehouses and utilities will continue to be concentrated, but will evolve and intensify in the Strategic Industrial Locations (SIL) in Beckton, Thameside East and West and Cody Road and smaller locally significant industrial areas (LILs) elsewhere, supported by appropriate environmental enhancements, buffering, and active but consolidated wharves;
- f. Whilst utilities infrastructure including transport depots, ferry access, sewage works and electricity pylons will continue to be present, supporting growth and investment, its spatial impact will be minimised to help secure compatibility with other uses as these come closer; new utilities infrastructure will be particularly related to the requirements of modern sustainable living and environmental resilience;
- g. Focused, vibrant, accessible and multi-functional Town and Local Centres will be strengthened according to their particular character, assets and opportunities as vital hearts to local neighbourhoods, with a clear hierarchy evident in function and form, from the Metropolitan Centre of Stratford, through to Major Centres at East Ham, Beckton Riverside and Canning Town, and District Centres at Green Street, Forest Gate and East Beckton, and local centres at other key transport nodes;
- h. New and enhanced open spaces and walking and cycling routes will be created throughout the borough, making best use of the borough's waterways and green spaces, securing the delivery of optimal route and nodal frequency, missing links and view corridors, to support the realisation of a connected, continuous permeable and legible movement and green space network; and
- i. All new development will be well integrated with its surroundings to create successful high quality and well connected areas, including the limitation of tall buildings to identified suitable locations.

### 3. Design and technical criteria

- a. Sites should be designed and developed comprehensively: the Council will resist the development of any sites in a piecemeal way, particularly where this would prejudice the realisation of the overall vision for the area or where timing of delivery would be unsupported by infrastructure. Large applications will be expected to be accompanied by realistic phasing proposals; and
- b. The expectation is that Strategic Sites and any major unallocated sites should be masterplanned, with particular attention to:
  - i. The successful integration of the scheme with the wider public area (including the transport network) and compatibility with existing uses;
  - ii. The transition between and neighbourliness of, different uses both within the site and in relation to adjacent areas, as per policies SP8 and J2;
  - iii. The proposed mix and arrangement of housing types, sizes and tenures, as per policy H1;
  - iv. Delivery of key strategic links and connections set out in Policies S2-6 and INF2 of new local/town centres and multi-functional community facilities (notably schools), public open space and other green infrastructure;
  - v. The accommodation of tall buildings as per the strategic approach set out in Policy SP4;
  - vi. The need to secure appropriate and proportionate contributions made by individual developments to the infrastructure requirements of the scheme as a whole.

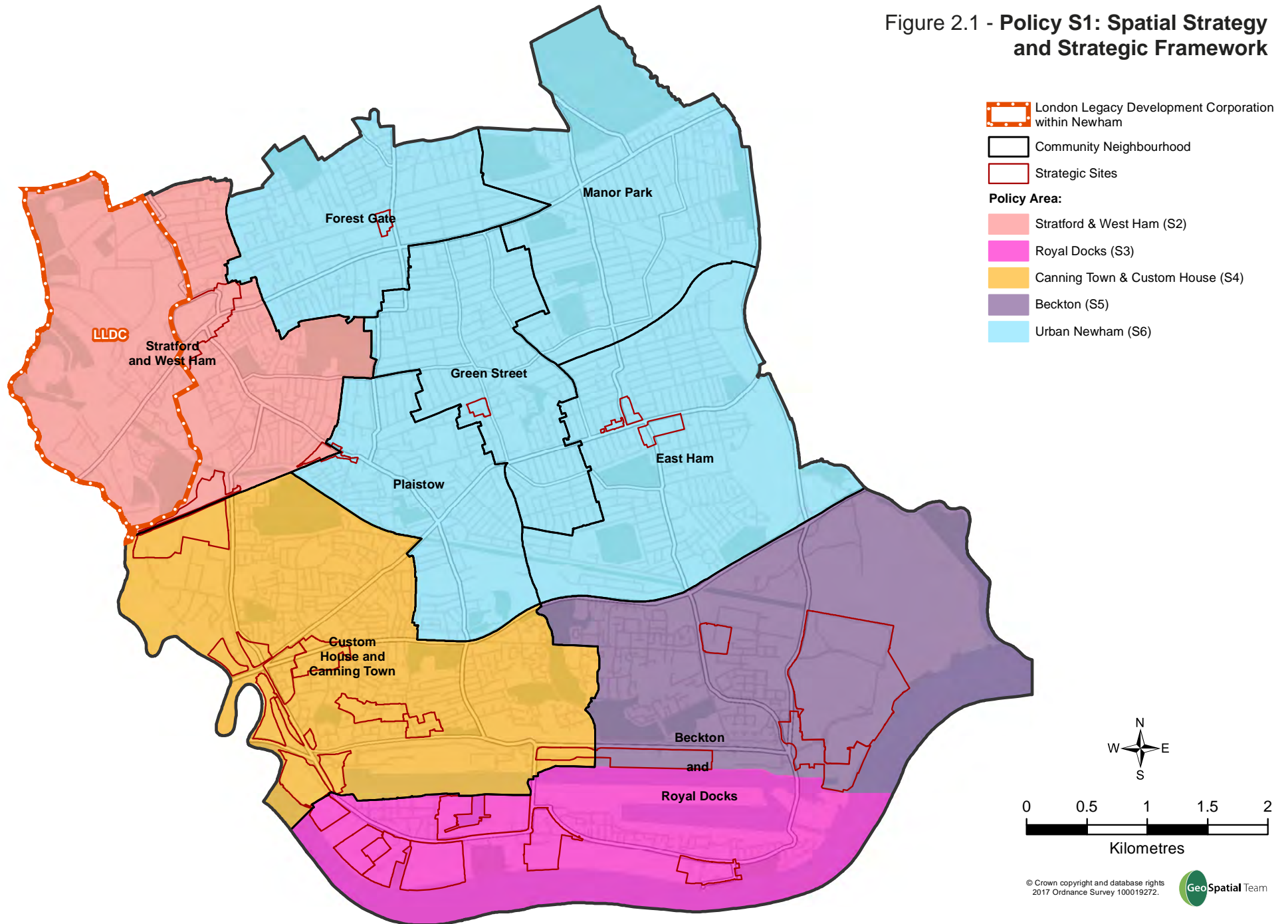
Strategic Sites have been identified which will contribute to the delivery of these objectives. These are allocated by Policies S2-6, detailed in Appendix 1, and shown on the Policies Map. The map below identifies the Community Neighbourhoods and their respective S2-6 policy.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Vision Based Spatial Strategy; 3. Design and Technical Criteria.

### Justification

- 5.2 Newham has a vital role in the continuing development of London as a World City. It is a vibrant, dynamic and ambitious Borough that seeks to continue to maximise the opportunities for transformation and regeneration catalysed through the 2012 Olympic and Paralympic Games wider sub-regional growth and other work by public agencies, and derived from excellent transport connections, a wealth of development land, established and emerging growth sectors, and a young, diverse and increasingly skilled population.

Figure 2.1 - **Policy S1: Spatial Strategy and Strategic Framework**





Overall, the Local Plan seeks to deliver 43,000 homes and 39,000 to 60,000 jobs between 2018 and 2033, as part of a series of new, genuinely mixed use places acting as a series of beacons across the whole area, woven into a fabric of equivalent quality and diversity.

- 5.2a This vision relates to the need to tackle the legacy of Newham's historic position in London whereby in being outside the more restrictive city boundaries, it became the disproportionately-favoured location for dirty, malodorous and noisy industry and infrastructure, and in turn suffered significantly from the demise of the docks and decline of certain traditional industries, and poorly designed social housing estates. While access to a wide range of infrastructure and employment uses is acknowledged as an engine for growth that the Local Plan seeks to reinforce, achieving transformational change requires significant improvements in the quality of design and overall offer of development, including a more balanced mix of uses, greater attention to local as well as strategic needs, better integration between and across sites and neighbourhoods, and more consideration of opportunity costs and externalities as well as benefits. In some cases this is about new types and forms of development; in others however, it is about providing adequate protection for industry and logistics (some of London-wide significance) and opportunities to work locally, breathing and social spaces and the settings of places and particular assets.
- 5.2b Successful place-making and the creation and sustenance of sustainable communities in Newham therefore require careful management of development: optimising it in relation to strengths and opportunities – ranging from large scale vacant sites to small scale infill/intensification and transition – rather than maximising it or pursuing singular agendas. This means pursuing quality, diversity and inclusivity not just quantity, long term sustainability as well as short term gains, balance in the provision of [types of] homes, jobs and physical, social and green infrastructure, addressing deficits as well as new needs arising, and ensuring investment in the Arc of Opportunity (the Arc) and the Web of Opportunity (the Web) provides opportunities for all of Newham's residents. Optimising development also means addressing the factors that have more traditionally meant Newham has been a 'port of entry' that people quickly move on from, (e.g. lack of housing choice, or quality schools) as well as new quality of life impacts arising from the scale and pace of development, together with issues relating to demographic and economic change in Newham and elsewhere. The latter includes for instance, an increase in older people requiring different types of housing; rising housing costs generating affordable housing needs; and continued relatively cheap rents drawing in disproportionate demand for certain types of space from outside of Newham which needs to be balanced against local need.
- 5.2c In turn, these considerations are important components of the Convergence and Resilience agendas pursued by the Council (and Growth Boroughs in the case of Convergence). This is about acknowledging the gaps in outcomes (such as health and life expectancy) within Newham and between Newham and boroughs further west, tackling causes and ensuring residents and businesses build resilience so they can weather more challenging times personally and through being part of a cohesive community and support networks. Population stability furthers this by ensuring that public and private investment in people is retained locally and generates local benefits, and by helping to foster strong local networks that pervade. Similarly, planning for mixed and balanced communities, and diversity of economic opportunity makes for more resilient neighbourhoods and places, as it spreads risk and reduces vulnerability, making it less likely that they will suffer spirals of decline.

- 5.2d The spatial strategy sets out how this optimisation and good growth will be achieved across the borough, acknowledging the different types of opportunities in different parts of Newham, conceptually represented by the Arc and the Web, drawing together more detailed positions set out in subsequent spatial and thematic policies and associated Strategic and Non-strategic Site allocations and designations. In doing so, and in interacting with the strategic principles, it also recognises that the relative scale of opportunity in the Arc is such that as well as meeting needs arising from new growth, development there (often across several Strategic Sites which act in concert across community neighbourhood and borough boundaries) will have an important role in addressing existing deficits in Urban Newham, a role requiring further attention to connection/barriers between Urban Newham and the Arc.
- 5.4 Of additional over-arching significance is the need for comprehensive development and masterplanning, particularly of large scale Strategic Sites in order to help them achieve multiple objectives, but also where several sites/interventions/developments in close proximity need to work together to achieve desired outcomes, and more broadly to support integration of new and existing development, and neighbourliness which becomes evermore important as competition for land increases and uses must necessarily co-exist closer together.

## Implementation

- 5.9 This policy sets out the over-arching vision for the borough, explaining the Key Diagram and providing the strategic framework that other policies cascade from and connect into. Policies S2-6 set out how the Strategic Principles and Spatial Strategy will be delivered at the community neighbourhood level, including phasing. Policies S2-6 therefore set out the Strategic Sites and other local designations which will make a contribution to the delivery of housing, jobs, services and infrastructure within each areas, building on thematic spatial policies and other thematic criteria set out in policies SP1-9, J1-3, H1-4, SC1-5 and INF1-9, which should be referred to for more implementation detail. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council.
- 5.11a In order to enable development of Strategic Sites and the Arc more generally, the Council will proactively engage with Duty to Cooperate partners and other stakeholders, including infrastructure and utility providers, developers and private landowners, and interested community groups, to remove barriers to delivery. This will include investigating a variety of means of funding and otherwise supporting, infrastructure and other development-enabling interventions, (e.g. land assembly, decontamination, decking and undergrounding), ensuring that these occur prior to development occurring or in a way that adequately future proofs.
- 5.11b Masterplanning is expected on all Strategic Sites and other more sizable windfall sites, notably those proposing multiple blocks/development platforms and a mix of uses. This will need to ensure no harmful impact on the living conditions of both existing and proposed residential occupiers and on the [multi-]functionality of new and existing spaces,

(including workspaces and public open space) and secure integration of building heights, housing types, (including housing to meet the specialised needs of local residents) and tenures, safe and convenient sustainable transport access, town and local centres and community facilities, green infrastructure including biodiversity net gain as well as between the site and the wider area. Such masterplanning should be the subject of early engagement with the public and other technical stakeholders, as well as consultation on different iterations as details are established. The Council's Statement of Community Involvement will be a relevant consideration in formulating a consultation strategy. Through this process it will also be expected that appropriate and proportionate contributions for individual developments to make to the infrastructure requirements of the scheme as a whole are indicated as per INF9 through an iterative process of capacity testing.

## Monitoring

- 5.11a Output monitoring will look at policy use in practice and progress on Key Strategic Sites and headline IDP planning and project milestones achieved via in-house monitoring, given these are vital to achieve the transformation of places in line with the vision. Outcome-relevant principles such as 'good growth', and 'community cohesion' and 'resilience' are more difficult to quantify, though can be assessed through qualitative data gathered through regular Council-commissioned survey questions concerning satisfaction with the area and different aspects of life, the personal ability to 'bounce back' and perceptions about the extent people feel comfortable living amidst others who live locally, though these are clearly only partly influenced by planning. Others, such as achieving a more stable community are more easily associated with existing, widely available indicators, and can be compared with other authorities to help measure convergence, though Council Tax records will be used to look more closely at internal churn.

However, it is noted that the delivery of the policy vision and objectives is also reliant on the support of partner public sector agencies, members and residents, as well as the collaboration of private landowners, developers and organisations, and wider market forces will also have a significant impact delivery. As such, continued liaison and discussion to ensure that such stakeholders buy into the vision and strategic principles will be important, pre-empting any problems or seeking to secure early solutions.

Success, particularly regarding convergence will also be reliant on the application of all other thematic and spatial policies, hence monitoring should take place in the round as far as possible.

### 5.11b Indicators:

- i. S-OP1 Strategic Sites Progress [Target: progress in line with the criteria and delivery timeline set out in Appendix 1];
- ii. S-OP2 Headline IDP milestones achieved [No specific targets, see IDP for timescales/key deliverables];
- iii. S-OP3 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective,

and supported at appeal];

- iv. S-OUT1- A Place People Choose to Live, Work and Stay:
  - a. S-Out1a Population Change through Migration [No specific target: churn should be reducing towards pan-London levels though in-migration likely to continue to be high due to strategic housing growth];
  - b. S-OUT1b: Satisfaction with the Area [Maintain above 75%, should be improving];
- v. S-OUT2 Resilience:
  - a. S-OUT2a: Local Area Cohesion [No specific target, should be improving];
  - b. S-OUT1b: Personal Resilience [No specific target, should be improving];
  - c. S-OUT2c: Life Satisfaction [No specific target, should be improving].

## S2 Stratford and West Ham

Proposals that address the following over-arching strategic criteria and spatial strategy will be supported:

### 1. Strategic Criteria:

- a. Achieve a distinctive, varied and thriving Metropolitan centre, together with secondary intensification and regeneration focused around Plaistow, Maryland and West Ham stations, providing investment and carefully managed development, to drive delivery of new and rejuvenated communities and significant economic growth;
- b. The regionally significant economic role of the area will be centred on Stratford which will provide major employment ~~hub~~ and business opportunities derived from its international, regional and local connectivity, quality of environment and strategic retail growth (including a significant amount of higher order comparison goods), tourism and visitor economy including food, drink, arts and cultural, quality leisure and evening and night-time activity, and significant healthcare and education facilities (including higher and further education), together with the extensive service sector supporting these; and
- c. Major new housing (at least 4286 units) and accompanying jobs growth and infrastructure provision will be delivered primarily on 3 Strategic Sites, acting in concert with those in adjoining neighbouring areas and well integrated with their surroundings, with non-strategic opportunities, including through Managed Transition and sensitive infill also being identifiable at locations close to other transport hubs and within the wider area.

### 2. Vision-based Spatial Strategy

- a. Stratford will maintain and extend its success as a town centre, becoming more integrated through physical linkages, improvements to legibility and parity of design and public realm quality with Stratford City and the International Quarter, with a significant reduction in the dominance of traffic and comfortable, convenient pedestrian and cycling movement, and with its Metropolitan status and unrivalled transport connectivity marked by careful distribution of the tallest buildings in the borough. Variety and distinctiveness will be fostered by the range of uses in the centre; a mix of unit types and scales including market facilities; local, wider London and international customers, visitors and businesses; and re-valuation of its heritage and character assets notably the St Johns Conservation area and listed buildings and proximity to the Queen Elizabeth Olympic Park and local waterways;
- b. Investment opportunities brought by Crossrail and associated public realm and interchange enhancements will improve the retail and service offer at Maryland local centre to better reflect its role as a gateway to Metropolitan Stratford and Urban Newham;
- c. New Local Centres and community uses focused around West Ham and Plaistow stations will become resource hubs for surrounding neighbourhoods including significant new

areas of housing, marked by new tall buildings and well-used by new and existing residents, local workers and others passing through the area;

- d. Outside of the Abbey Mills and Plaistow North Strategic Sites, which will see comprehensive development, residential hinterlands will undergo gradual renewal brought about by the cumulative impact of small scale changes, including public realm and smaller scale infrastructure improvements particularly focused on the Key Corridors of Romford Road, Leyton Road/ Angel Lane, Manor Road and West Ham Lane/New Plaistow Road;
- e. The area's other heritage and character assets, notably University Conservation Area, Church Street North ATV, West Ham Park and its setting and view towards St John's Church in Stratford, views from and access to the Greenway, and access to waterways, will be enhanced, ensuring that they form an integral part of the area's future through sensitive integration in line with Policies SP5, J1, INF6 and INF7;
- f. Improvements to local permeability and connectivity, notably east-west south of the High Street, and across the High Street will overcome barriers to movement caused by railways, busy or disconnected roads, waterways, and key development sites to increase integration with surrounding areas and between new and existing communities;
- g. Industry and transport facilities, notably the Jubilee Line engineering depots and smaller local businesses will continue to be present in the southern part of the area close to Abbey Road DLR station, but with LMUA sites at Maryland Industrial Estate, Grove Crescent, Canning Road West and Bridge Road Depot and additional micro-opportunities between Stratford and Maryland, will be moving towards lighter, cultural, creative and service uses more compatible with residential and other contexts, including the presence and adjacency of the Abbey Gardens and West Ham Pumping Station heritage assets;
- h. Public transport access will be further enhanced, with significant improvements to interchange capacity in and around Stratford and West Ham Stations, step-free access improvements at Plaistow Station, and the development of new and improved services along the associated rail, tube, DLR and bus corridors;
- i. The provision, quality and access to open space will be improved, including extending green grid links to the Greenway, the Lea River Park and Queen Elizabeth Olympic Park and improving access to the Abbey Creek, and waterways, and other measures to improve the activation of parks and open spaces;
- j. New schools, further and higher education provision and healthcare together with flexible community spaces will develop at accessible sites in or well-related to centres and Key Movement Corridors, notably the Romford Road;
- k. Local energy generation and district heating will-be typical throughout the area with major developments being required to enable linkage to networks; and
- l. In order to deliver the above vision-based spatial strategy, the following Strategic Sites sites, as shown on the Policies Map, are allocated for development as set out in Appendix 1:

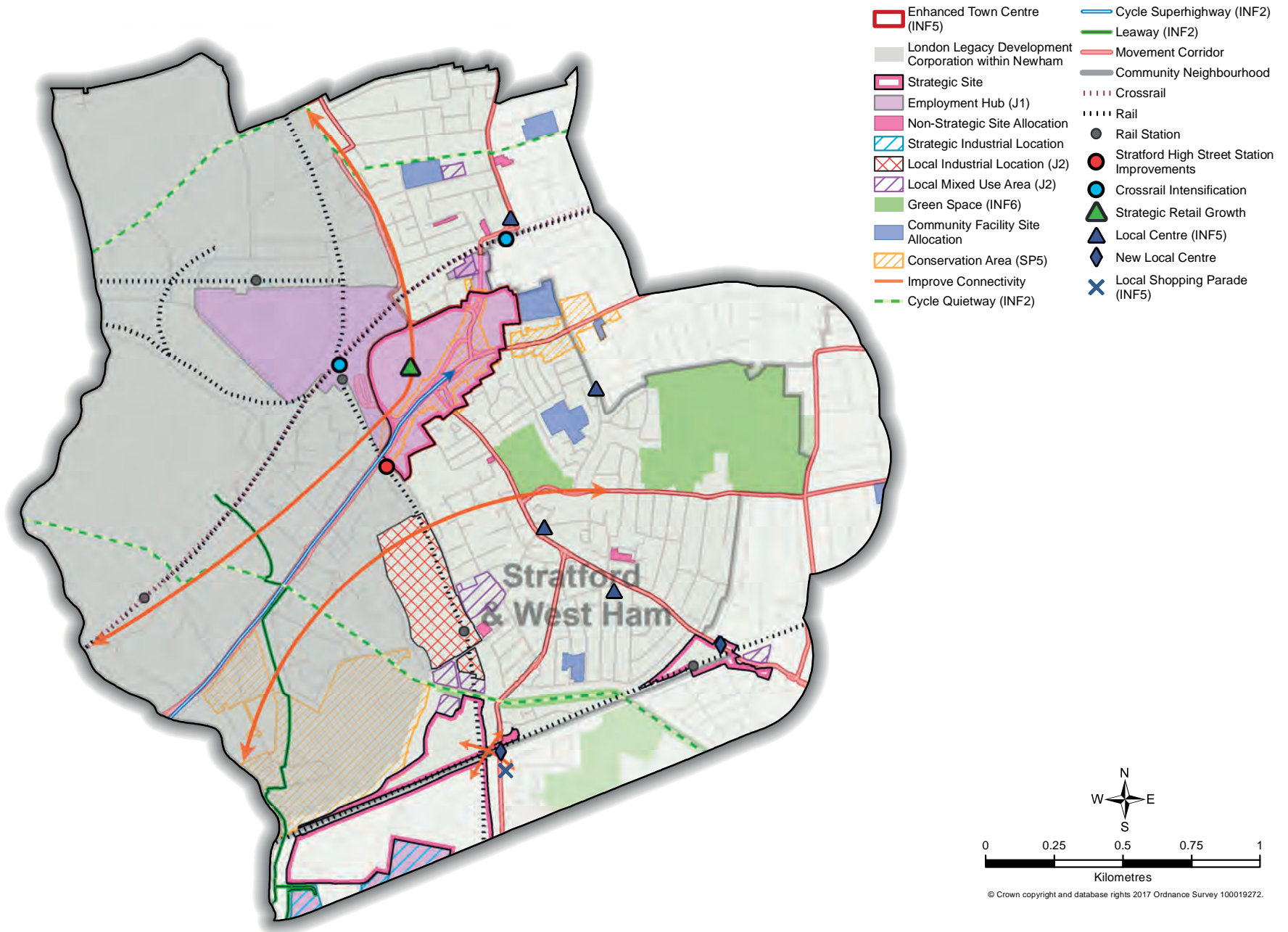
For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Vision Based Spatial Strategy.

### Justification

- 5.12 This Community Neighbourhood is made up of several distinctive and related parts. It has two wards: Stratford and Newtown and West Ham. Stratford town centre stands at the gateway to Newham, and is characterised by, the High Street and historic buildings in the old centre, including the major landmark of St John's Church, and the new green and sports infrastructure that form part of the Queen Elizabeth Olympic Park. Stratford is one of London's major transport interchanges with excellent accessibility to Central London and the wider region and international destinations. It has a large indoor shopping centre and cultural quarter, including the Theatre Royal, Stratford Picture House and Stratford Circus. However, since the 1960s the town centre has become dominated by traffic with the shopping mall surrounded by busy roads. Most of the village of West Ham was redeveloped for social housing during the 1960s-70s and few original buildings survive. Notable exceptions include the landmark Norman church of All Saints and its Church Road ATV setting, and West Ham Park with its remnant 19th Century setting and views out of the park towards Stratford church and Canary Wharf. The area also includes Abbey Mills pumping station, a major listed industrial building forming part of the setting of Abbey Mills strategic site.
- 5.16 The area is subject to major infrastructure investment including key transport projects such as Stratford International Station, Crossrail, and DLR enhancements. Major investment in the development of the Olympic Park and the delivery of legacy sites, , has already resulted in transformational change to Stratford and West Ham, bringing major development and investment in the quality of the environment and lifting Stratford to an international role. Significant challenges remain in integrating the new with the old, including equalising environmental quality and widening access to the new opportunities provided by major development. Further reducing barriers to movement and integrating these areas is a key objective for the Local Plan, as set out in more detail in policy INF2, the IDP and the Character Study; in principle, enhancements and new connections to Key Movement Corridors, the Greenway and the Leaway/Lea River Park, will play a special role in realising this objective.
- 5.18 The vision for Stratford Central is for it to be an integral part of a thriving Metropolitan Centre, which will be a hub for surrounding communities; a gateway Newham; and a destination in its own right. A strong connection will be formed between the existing town centre with finer grain retail, workspace and cultural assets, and Stratford City, with large scale new shopping and leisure facilities. This will create a vibrant place that will serve an international and regional community, given strategic transport connections already in place, whilst retaining a distinctive East End character. The town centre encompassing



Figure 2.2 - Policy S2: Stratford & West Ham



Note: The boundaries on this map, and other fixed lines/areas (i.e. excluding indicative arrows etc.) will be replicated on the Policies Map



Stratford City and Stratford town centre will operate as an Employment Hub (see Policy J1), incorporating office, cultural, educational and community uses, as well as opportunities for high density residential development sensitively integrating with and enhancing the historic setting of the listed buildings and Conservation Areas. Further transformation in the quality of Stratford as an attractive and vibrant place will be sought, along with the implementation of specific public realm improvements. Improved links will also be created with surrounding neighbourhoods.

- 5.21 Abbey Mills and Plaistow North Strategic Site will bring forward new, high quality mixed use development. Plaistow North will create a new focus for the local community through creation of a new local centre around the station. Abbey Mills will support the development of a new local centre at West Ham and will be set within the context of the River Lea, where new public open spaces and pedestrian and cycling routes extending north and south will be opened up, taking in heritage attractions such as Sugar House Lane, Abbey Mills, the listed gas holders and river heritage (the Lea River Park). New river crossings over the River Lea to Tower Hamlets will provide the links that will finally overcome the major barriers that have separated the borough from the rest of London for almost two centuries.
- 5.22 New housing is also being built on various sites in the area under the remit of the Mayor's London Legacy Development Corporation.

## Implementation

- 5.23 The delivery of the three Strategic Sites will be key in the future development of the area, alongside continued cooperation with the LLDC to ensure that development either side of the border supports integration and cohesion. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council.
- 5.24 The Council is a major landowner in Stratford and its land will be used to encourage development and lever value. Compulsory Purchase Orders that may be required to deliver schemes in line with this policy will be supported.
- 5.27 The policy is in effect the detailed spatial expression of many of the thematic policies in the plan which should be read and deployed in conjunction with it. More detailed guidance and advisory information is available as part of the Town Centre and Retail Study; Employment Land Review; Character Study; the Strategic Flood Risk Assessment, and IDP. All these documents can be accessed on the Council's website<sup>1</sup>. Airport safeguarding information and mapping can also be viewed on the council's GIS system<sup>2</sup>. The London Heat Map<sup>3</sup> provides further detail with regards to the opportunities of delivering decentralised energy in the Stratford and West Ham area.

## Monitoring

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<sup>1</sup> LB Newham, [Local Plan development and review](#)

<sup>2</sup> LBN, [GIS mapping](#)

<sup>3</sup> GLA, [London Heat Map](#)

5.29a See S1, noting that S-OP-1, 2 & 3 and S-OUT-1b can be broken down by CN/spatial policy area.

## S3 Royal Docks

Proposals that address the following over-arching strategic principles and spatial strategy will be supported:

### 1. Strategic Principles:

- a. The Royal Docks will become a unique and high quality waterfront mixed use urban quarter, realising the value of its many locational advantages and limited, plan-led, carefully Managed Release of employment land in combination with co-location, intensification and sensitive infill, and innovative responses to flood risk;
- b. Delivery of at least 8404 new additional homes and significant numbers of the borough's targeted jobs growth will add to existing employment and communities and create new neighbourhoods. The majority of these will come forward on 7 Strategic Sites, acting together with those in neighbouring areas, with non-strategic infill and activation opportunities identified at scattered locations within the wider area; and
- c. The Royal Docks will continue to perform a growing economic role in the production, conference, tourism and leisure, and increasingly higher education, social enterprise and green industry sectors, and incubation across a range of sectors including digital and creative, focused on the Enterprise Zone, which will be a world class business centre and an international forum for the exchange of knowledge and ideas.

### 2. Spatial Strategy:

- a. Today's fragmented residential development will become consolidated into distinct but interconnected neighbourhoods, and benefiting from a network of new and enhanced green and open spaces and continuous waterfront access, and good access to stations, buses (including riverbuses) and an enhanced walking and cycling network. New neighbourhoods, at West Silvertown, Silvertown, North Woolwich, Royal Victoria Dock and Albert Basin, will each offer a range of quality community and social infrastructure including new schools, health care facilities, community meeting places and local retail and services, with further connections to facilities on the ExCeL estate and at Custom House/Freemasons local centre, and Canning Town, East Beckton, Beckton Riverside and Woolwich town centre;
- b. New street-based local centres will be developed at Thames Wharf and West Silvertown focused around North Woolwich Road and the DLR stations, and North Woolwich Local Centre will be enhanced in terms of the quality and diversity of offer (including public realm) and nearby well connected complementary uses, with all centres benefiting from pedestrian and cycle links to neighbouring residential areas;
- c. The sections of North Woolwich Road between Tidal Basin roundabout and North Woolwich Roundabout, and longer term, Albert Road between North Woolwich and Albert Island, will be reconfigured to provide high quality, active pedestrian environments at a human scale, and increased cycle and public transport network accessibility, in line with Policies SP7, INF2 and having regard to Policies INF6 and INF7-;

- d. Industrial areas will re-vitalise in consolidated form at Thameside East and West, in the Albert Island (benefiting from Enterprise Zone status) and St Marks LILs, anchored by successful businesses committed to the area, and new wharf and boatyard facilities, and buffered by modern industrial, flexible business and warehouse buildings that are configured to provide the necessary transition to neighbouring residential environments, achieving waterside access, separation of industrial and residential traffic and making use of and river based transport, where possible, and market sensitive diversification of the accommodation offer, which will be further complemented by mixed use cultural and creative hubs around North Woolwich Station and in the Silvertown Arches LMUA;
- e. Consolidation of four safeguarded wharves in the Royal Docks (Thames, Peruvian, Manhattan, and Sunshine) at Central Thameside West on Peruvian and Royal Primrose Wharves will achieve no net loss of functionality or wharf capacity with additional development conforming with the associated SIL designation and complementing the wharves, including through maintaining access to them;
- f. A package of river crossings, accessible bridges over the docks to the ExCel Centre and over the rail corridor between London City airport and Connaught Riverside, new riverboat services, improvements to the DLR and bus services (which will have evolved to address [new] desired patterns of movement) and access to Crossrail services will ~~to~~ provide strategic and local access for residents and visitors;
- g. London City Airport will continue to perform an important role in the area's international business and visitor connectivity and as the focus to an employment hub with measures implemented to support the optimisation of existing capacity and further mitigation of its environmental impacts, including improvements to public transport;
- h. The area's key character assets, namely the open water and remaining historic buildings and structures of the docks, river/dockside views and access, and Victorian heritage of North Woolwich around the station, Woolwich Manor Way Area of Townscape Value, Lyle Park and Royal Victoria Gardens, will be re-valued and enhanced, whilst achieving appropriate mitigation of flood risk, ensuring that they form an integral part of the area's future, with building heights decreasing with distance from Canning Town towards the east;
- i. Local energy generation and district heating will be typical throughout the area with major developments being required to link and/or add to existing networks in addition to the provision of significant new energy transmission and ICT infrastructure to meet business, residential and transport needs; and
- j. In order to deliver the above vision-based spatial strategy, the following Strategic Sites, as shown on the Policies Map, are allocated for development as set out in Appendix 1:  
 S21 Silvertown Quays  
 S22 Minoco Wharf  
 S09 Silvertown Landing  
 S07 Central Thameside West  
 S20 Lyle Park West  
 S23 Connaught Riverside

## S04 North Woolwich Gateway

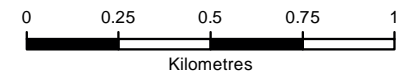
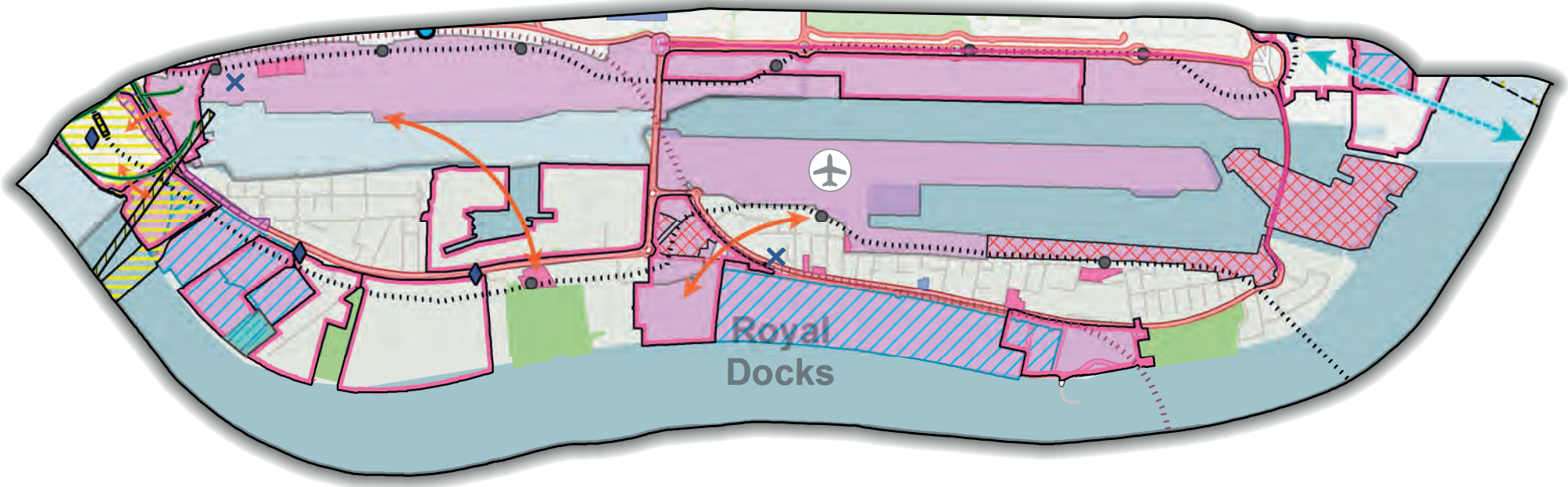
For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Vision Based Spatial Strategy.

### Justification

- 5.32 The Royal Docks extend from Royal Victoria Dock and West Silvertown at the western end, through King George V Dock and Royal Albert Dock, London City Airport to Albert Basin, Albert Island and North Woolwich to the east, connecting and providing a relationship between areas across several Community Neighbourhood Areas. Almost half of the area is water. Much of the area is industrial, particularly south of the docks, with important economic drivers in these areas and around including the ExCeL conference centre, Tate and Lyle, University of East London, London City Airport. The Docks have benefited from hundreds of millions of pounds of investment in recent years and the pace of change is becoming rapid, with new neighbourhoods emerging at Royal [Minoco] Wharf and an increase in planning applications coming forward on smaller sites, as well as infrastructure and social and economic regeneration projects underway partly under the auspices of the only Enterprise Zone in London. The Local Plan therefore needs to bring these opportunities together in a managed and coordinated way to maximise the long term benefits, acknowledging the opportunities for transformational regeneration, with potential to make a significant contribution to the borough's objectives for providing new homes, jobs and services complementing and where relevant, spatially referencing the ongoing joint-working between the GLA and the Council on the Enterprise Zone's Detailed Delivery Plan and its financing, which will be further recognised in the evolving IDP.
- 5.35 In terms of design, some earlier development schemes were poorly integrated with each other and existing neighbourhoods, and the communities/neighbourhoods to the south of the Docks have lacked local facilities and defined Local Centres, as well as connections to nearby alternatives. The general quality of the urban environment continues to be a challenge with high levels of traffic, aircraft noise and heavy industrial activity, together with a lack of investment and legacy of poor post-war design in some areas, and some parts are isolated from the rest of Newham. The area's relatively dispersed historic assets, including the Millennium Mills and Silo D, Former St Mark's Church (Brick Lane Music Hall), and Victorian heritage of North Woolwich around the station and Woolwich Manor Way Area of Townscape Value, could also be better integrated and activated, and many form part of strategic allocations in the area that should help achieve this. Other important character assets include structures of the docks, river/dockside views and access, Lyle Park and Royal Victoria Gardens, as well as the more recent Thames Barrier Park.
- 5.36 With a Crossrail station opening at Custom House by 2018, reconfigured bus routes, enhanced DLR services, reactivating wharf operations and in the longer term, public transport links to the east and further river crossings, wharf consolidation and riverbus services, the strategic transport connections are improving. However, at a local level, finer grain connections for walking and cycling are still poor for local residents both within the Docks and from the surrounding area, and need to be improved, addressing key dock and rail corridor barriers, as well as the quality and comfort of the pedestrian and cycling

Figure 2.3a - Policy S3a: Royal Docks

- |   |  |
|---|--|
|  Strategic Site                      |  Cable Car Protection Zone    |
|  Employment Hub (J1)                 |  Improve Connectivity         |
|  Non-Strategic Site Allocation       |  Environmental Improvements   |
|  Strategic Industrial Location       |  DLR Extension                |
|  Local Industrial Location (J2)      |  Leaway (INF2)                |
|  Local Mixed Use Area (J2)           |  Movement Corridor            |
|  Green Space (INF6)                  |  Community Neighbourhood      |
|  Community Facility Site Allocation  |  Crossrail                    |
|  New Safeguarded Wharf               |  Rail                         |
|  New DLR Station (Passive Provision) |  Rail Station                 |
|  Thames Gateway Bridge Safeguarding  |  Crossrail Intensification    |
|  Silvertown Crossing Safeguarding    |  Local Centre (INF5)          |
|   |  New Local Centre             |
|   |  Local Shopping Parade (INF5) |

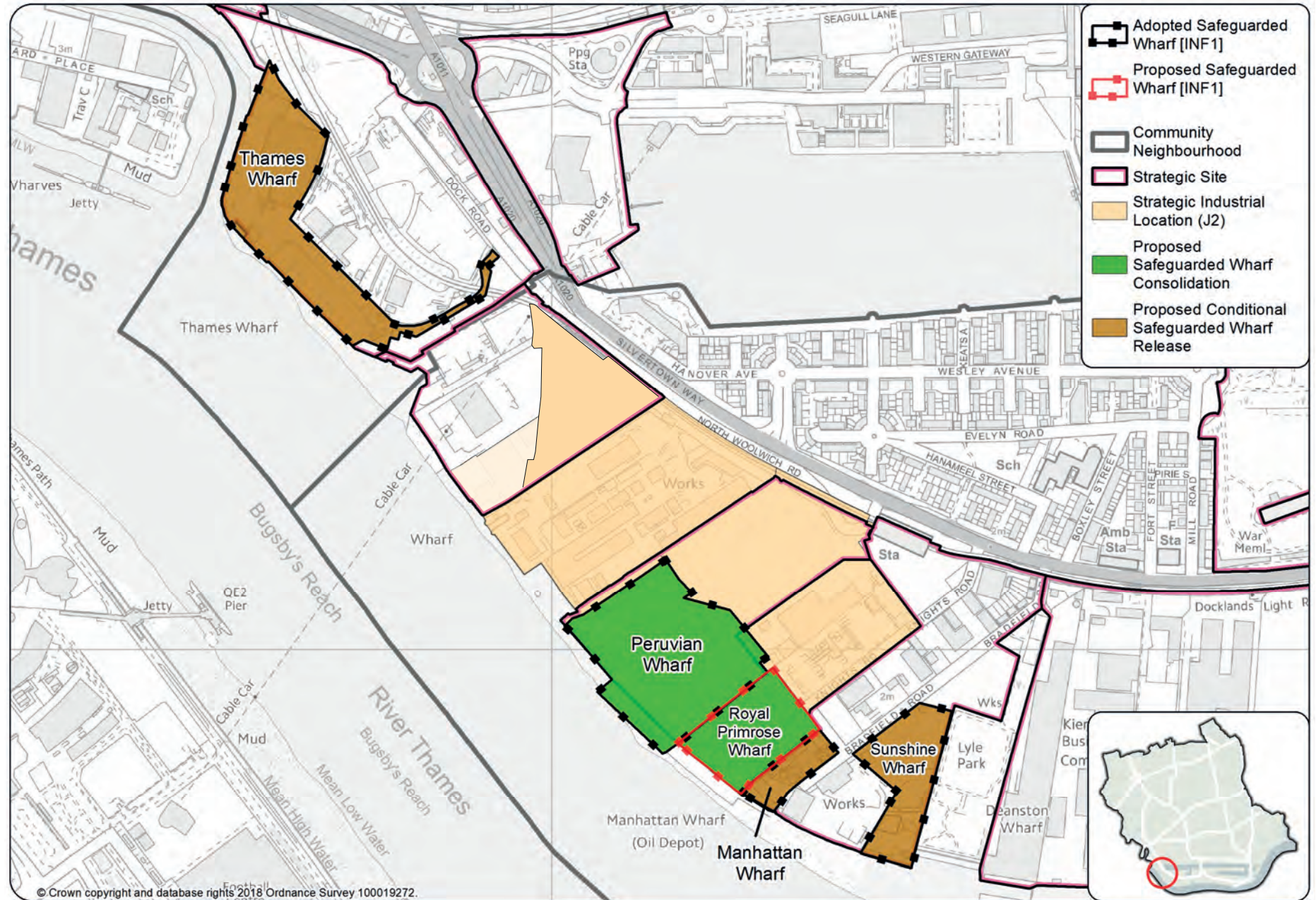


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Note: The boundaries on this map, and other fixed lines/areas (i.e. excluding indicative arrows etc.) will be replicated on the Policies Map



Figure 2.3b - Policy S3b: Inset - Thameside West Wharf Consolidation Strategy



Note: The boundaries on this map, and other fixed lines/areas (i.e. excluding indicative arrows etc.) will be replicated on the Policies Map

experience, riverside and dockside access. Achieving the transformation of North Woolwich Road and Albert Road to pedestrian and cycle friendly activity streets, including through the activation of Silvertown Arches LMUA as a cultural hub, will be key to improving the connectivity and quality of the local environment.

- 5.37 London City Airport is a major employer and a catalyst for investment within the area, supporting London's international role. Its presence is being consolidated by the City Airport Development Plan (CADP) to help optimise its capacity, further mitigate impacts and improve public transport access. Further into the future, there could also be an opportunity to bring forward an additional Crossrail station at London City Airport, should impact tests be overcome.
- 5.38 A number of wharves on Thameside are safeguarded in the London Plan (and by a Direction from the Secretary of State), protecting them from development which could prejudice their future use for transporting goods by river. However, the wharves are spaced out across the river frontage and the land is in many cases underused, as such it makes sense to consolidate, reactivate and relocate wharf facilities at Central Thameside West, subject to no loss of functionality or wharf capacity, which would free up part of the river frontage for, and further enable, mixed use development at Lyle Park West and Thames Wharf. This will need careful phasing, management and design on the part of these Strategic Site developments to ensure neighbourliness and transition between uses, ensuring the remaining SIL remains functional and, reflecting its regional economic role. The safeguarded wharf at Tate & Lyle's Thames Refinery remains operational and is not affected by the consolidation strategy. A London-wide review of safeguarded wharves has been commissioned, and the report will be published as part of the New London Plan in 2018.
- 5.40 Given the importance of the Royal Docks to the regeneration of Newham and development of London, and investment in strategic infrastructure capacity it is proposed to release a further part of Thameside West from its designation of Strategic Industrial Location at Lyle Park West and the western side of Silvertown Landing, adding to release already in train at Minoco Wharf. Similarly, partial managed release of SIL from Thameside East at the western side will allow for the delivery of a new riverside neighbourhood at Connaught Riverside, whilst sustaining the regional economic role of Thameside East, anchored by the Tate and Lyle sugar refinery. Policy J2 sets out the proposed Strategic Industrial Location release in the borough in more detail.
- 5.40b Woolwich Ferry and the foot tunnel are an important gateways to the Royal Docks and Newham, and bringing together various smaller scale opportunity sites as part of North Woolwich Gateway Strategic Site provides an opportunity to secure transformational change, including activating and enhancing heritage and character assets and deliver additional cultural, community and creative uses, focused around North Woolwich Station, to complement the local centre adjacent, as well as significant new SIL capacity, to complement that further West.
- 5.40c Waterside sites, together with the scale of development afford the opportunity to support more sustainable forms of energy generation and distribution, reducing the strain on the traditional grid, and to taking advantage of existing network feasibility work, and projects planned and emerging, in line with policy INF4.



## Implementation

- 5.41 While the potential for transformation is huge, there is a need to take a coordinated, managed transition approach which considers the most appropriate locations for new and expanding neighbourhoods a more efficient use of the land resources for employment uses, including wharves, modern warehousing and industry, research and technology, tourism, leisure and culture, media and service industries, and to ensure the Docks are better connected with the rest of the borough and beyond, as well as significantly improved local connectivity and permeability, walkability and cycling facilities. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council.
- 5.42 The Council will work with its partners including the PLA and GLA, to secure the release of the currently safeguarded Sunshine and Manhattan Wharves in the Royal Docks, and Thames Wharf in adjacent Canning Town and Custom House, upon their consolidation/relocation within Central Thameside West; PLA are a consultee for any proposal affecting these wharves. London Plan policies, and the Mayor's Safeguarded Wharves Review when published, will also be relevant to assessment of proposals. In order to allow for the full range of river uses to continue, especially large sea-going vessels, PLA are also a consultee for any river crossing proposals.
- 5.43 The Council is only a modest landowner within the Royal Docks; however, there are other significant public sector land holdings in the area, predominantly the GLA, and the Council will work with other public sector agencies to assess the need for supporting infrastructure and where appropriate manage site assembly and delivery.
- 5.44 The policy is in effect the detailed spatial expression of many of the thematic policies in the plan which should be read and deployed in conjunction with it, along with associated technical studies (including the Character Study, the Strategic Flood Risk Assessment, Employment Land Review, and Retail and Town Centre Study) and the IDP. All these documents can be accessed on the Council's website<sup>1</sup>. The London Heat Map<sup>2</sup> provides further detail with regards to the opportunities of delivering decentralised energy in the Royal Docks. Airport safeguarding information and mapping can also be viewed on the council's GIS system<sup>3</sup>.

## Monitoring

- 5.44a See S1, noting that S-OP-1, 2 & 3 and S-OUT-1b can be broken down by CN/spatial policy area.

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<sup>1</sup> LB Newham, [Local Plan development and review](#)

<sup>2</sup> GLA, [London Heat Map](#)

<sup>3</sup> LBN, [GIS mapping](#)

## S4 Canning Town and Custom House

Proposals which address, and where appropriate accord with the following over-arching strategic principles and vision-based spatial strategy will be supported:

### 1. Strategic Criteria:

- a. Achieve an enhanced, integrated, mixed and balanced neighbourhood including new waterside quarters, with and an expanded successful town centre at its heart and secondary focuses and intensification at Thames Wharf, West Ham and Custom House/Freemasons Local Centres, together with strengthened employment areas;
- b. The area's regionally-significant economic role will be reinforced through further development of the existing warehousing, engineering and green industry, and visitor economy, business and conference clusters with good access to the Strategic Road Network, complemented by town centre growth and change towards Major Centre status, and bolstered by the new Crossrail station; and
- c. Major new housing (at least 15,608 additional units) , jobs growth and infrastructure provision will be delivered through a comprehensive programme of regeneration and renewal and managed release of SIL and associated wharf consolidation primarily on 12 Strategic Sites, acting in concert with those in adjoining neighbouring areas and well integrated with their surroundings, with non-strategic opportunities, including through managed transition, activation and sensitive infill also being identifiable at locations within the wider area.

### 2. Spatial Strategy:

- a. Canning Town town centre will be revitalised, intensified and expanded, growing in status – marked by some of the tallest buildings in the borough – as well as physical extent, benefiting from high quality public realm, a renewed market space, a better quality and mix of shops and other uses including leisure and workspace that improve activation, trade draw and dwell time, and improved east-west links to the station interchange and to adjacent residential neighbourhoods, functioning as an employment hub and broader focus for activity and facilities both during the day and into the evening. Variety and distinctiveness will be fostered by the range of uses in the centre; a mix of unit types and scales; and effective integration with the existing high street part of the town centre, surrounding neighbourhoods and heritage assets, including development of attractive gateway sites with complementary uses and settings and a careful distribution and composition of tall buildings that protect views and make appropriate transitions;
- b. Custom House will become the primary gateway to south Newham and the Royal Docks with the opening of Crossrail. Custom House station will become the centre of an effective transport interchange that connects with Freemasons Local centre and through to the ExCeL Centre, London City Airport and beyond, supporting a renewal and expansion of the centre welcoming both local residents and visitors to ExCeL and other dockside destinations. As the main north-south connection, Freemasons Road will become a place where people choose to walk, cycle and use public transport as well as

stop and rest. Development will be intensified in the vicinity of Custom House and Royal Victoria stations, making best use of land, including undergrounding of pylons should opportunities arise, whilst not contravening sustainable community and design quality objectives, achieving coherence and integration with other development in the area;

- c. New local centres and community uses focused around West Ham and Thames Wharf stations will become resource hubs for new neighbourhoods and surrounding areas, marked by new tall buildings and well-used by new and existing residents, local workers and others passing through the area, with visitors drawn into the sites, towards the rivers by attractive parkland routes and onward connections;
- d. Elsewhere, Abbey Arms will be a key Local Centre-and resource hub, with further local shopping protected at Cundy Road, Fife Road and Western Gateway;
- e. Two new streets will be created across the area: one residential in character, one more activity-based and including green infrastructure. These will provide important connections between the town centre, surrounding neighbourhoods, important and improving community facilities and open space, and the other key node of Freemasons/ Custom House;
- f. Links will also be improved with surrounding areas including to the district centres at Bromley-by-Bow and East Beckton, to stations, the town centre from the south, the Lea River Park and Greenway, the docks and ExCel/Royal Victoria and Royal Albert employment hubs, and the Thames with new accessible bridges put in place and re-opened over rivers and other barriers, amongst others, along the Leaway (see Canning Town and Custom House Inset map) facilitated by the release of Mayer Parry and Priors Wharves, at Customhouse, over the dock to Silvertown Quays, as well as through general increased pedestrian and cycling permeability and comfort (notably along North Woolwich Road), interchange improvements, and bus routes that have evolved to address [new] desired patterns of movement;
- g. Cody Road together with Prologis Industrial Estate will continue to be an important employment location, focused particularly on heavier industry, (include waste processing and engineering) warehousing and distribution, with Strategic Sites at Canning Town Riverside and Parcellforce, and the LMUA at Bidder Street managing the transition to residential to the north and south; Managed Release of SIL and the associated Safeguarded Wharf at Thames Wharf will occur in the context of wider industrial opportunities in the Royal Docks, allowing for re-location and re-provision/consolidation off site;
- h. The dockside mixed use leisure, convention, recreation and business district focused around the ExCeL Centre, Crystal Building and Cable Car, will be a further employment hub, with a focus on consolidation and integration within the area, addressing deficiencies such as lack of green space, poor pedestrian environment along Seagull Lane, the cumulative impact of tall buildings, and the barrier effect of the Crossrail line and of long linear development, developing new links with the complementary evolving employment hub at Royal Albert;
- i. LMUAs at Bidder Street, Silvertown Arches, Esk Road and Beeby Road and additional

micro-opportunities to the east of Canning Town Centre, will complement and further diversify the employment offer moving towards lighter, cultural, creative and service uses more compatible with residential and other contexts; smaller scale industrial opportunities will also be available at Butchers Road LIL;

- j. Outside of the Strategic Sites – which will see comprehensive development replacing underused employment land and lower quality or poorly laid out housing and commercial uses with a wider variety of sizes and tenures in a series of high quality, well-connected, safe and sustainable neighbourhoods which have easy access to employment and new and enhanced community facilities – residential hinterlands will undergo more gradual renewal brought about by the cumulative impact of small scale changes and character sensitive infill including public realm and smaller scale infrastructure improvements particularly focused on the Key Corridors of Barking Road, North Woolwich Road, Victoria Dock Road, Silvertown Way, Manor Road, Freemasons Road /New Barn Street/Butchers Road/Munday Road, Hermit Road/Grange Road/Upper Road, and Balaam Street;
- k. New and improved open space connecting with the green grid and integrating and re-valuing heritage assets will be provided-amidst large scale residential development and through the ongoing evolution of the Lea River Park linking the Queen Elizabeth Olympic Park to the Royal Docks and Thames and across to communities in Tower Hamlets, with continuous linear greenspace broadening out at Cody Dock and Royal Victoria West and into parks at Bow Creek Ecology park - which will be enhanced, and on the Limmo Peninsula and at the Bromley by Bow gasholders, which will be made publicly accessible and will make substantial contributions to district and local park deficits in the wider area;
- l. Local energy generation and district heating will be extended in the area with Major developments being required to enable linkage to networks; and
- m. In order to deliver the above vision-based spatial strategy, the following Strategic Sites sites, as shown on the Policies Map, are allocated for development as set out in Appendix 1:

S08 Thames Wharf  
 S11 Parcellforce  
 S13 Manor Road  
 S14 Canning Town Central  
 S15 Canning Town East  
 S16 Silvertown Way East  
 S17 Silvertown Way West  
 S18 Limmo  
 S28 Custom House/ Freemasons  
 S30 Royal Victoria West  
 S12 Canning Town Riverside  
 S06 Coolfin North

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles; 2.Vision Based Spatial Strategy.

## Justification

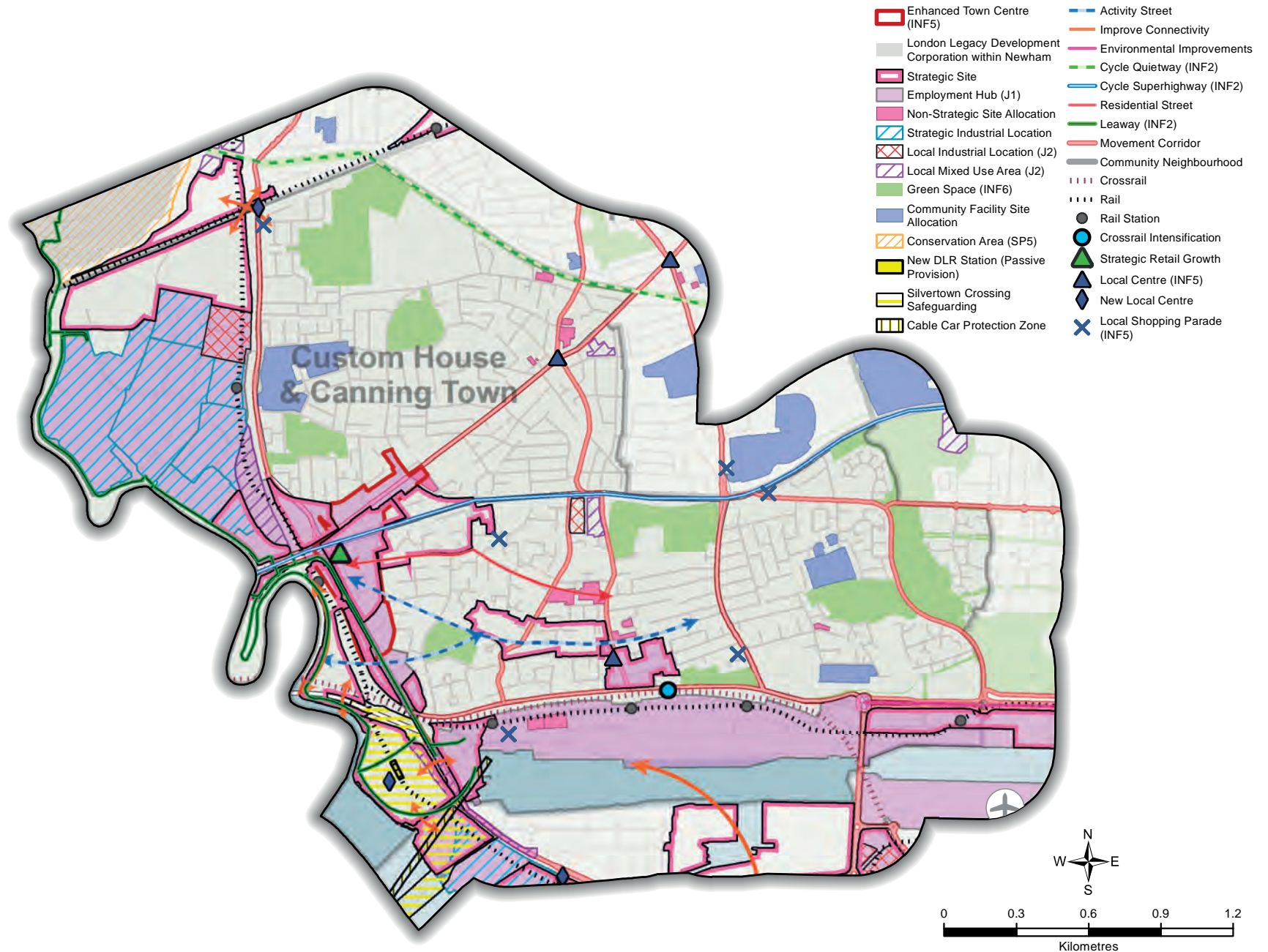
- 5.47 Canning Town and Custom House is a historic East End neighbourhood that has been in existence since the mid - 1800s, when poor quality workers' slum dwellings were built to support heavy industry around the Royal Victoria Dock. Following extensive war damage and waves of regeneration in the early 20th Century and post-war period, today's Canning Town and Custom House is mainly a residential neighbourhood, with development including terraced houses, walk-up maisonette blocks and point tower blocks. It incorporates a district centre and important tube, DLR and bus connections at Canning Town station, as well as significant areas of industrial and commercial units around Cody Road and a strong visitor economy focused around the international conference and events centre, ExCeL.
- 5.47a Whilst the area has no Conservation Areas, fragments of important historic development are pepper potted throughout the area. Examples include the Grade II listed churches of Roman Catholic Chapel of St Margaret, Memorial Baptist Church, and Chapel of St George and St Helena, Grade II listed pubs Fairbairn Hall and the Connaught Tavern, and seven Grade II listed gasholders at the former Bromley-by-Bow gasworks site in the north, and industrial heritage such as warehouses and cranes alongside Royal Victoria Dock. The Victorian Church of St Luke in Canning Town has a spectacular spire, visible from the 1930s Silvertown Way viaduct, (in itself notable for being the first 'flyover' in Britain) though it is surrounded on all sides by industrial development, post-war housing and contemporary flats. Parts of Barking Road in this area are also distinguished by a small number of buildings of local historic interest, forming the Barking Road (West) Area of Townscape Value that includes the former Canning Town library, one of a number of buildings established by John Passmore Edwards (a wealthy philanthropist) in the late 19th Century, and the adjacent Public Hall.
- 5.48 The area declined in the 1970s and 80s, its residents suffering from the demise of dock-related industry by the late 1970s and a legacy of poor urban design (including poor connectivity), poor quality, monotonous housing and intrusive infrastructure which create significant barriers and visual impacts. While investment, redevelopment and other regeneration initiatives spanning over a decade have helped improve the outcomes for local residents, much of the area still falls within the top 10% most deprived areas in England and Wales<sup>1</sup>. The need to turn this around, together with the area's excellent potential given its existing and improving connections – with a Crossrail station at Custom House, proximity to Canary Wharf and waterside sites – has been the impetus behind the £3.7 billion Canning Town and Custom House Regeneration Programme, which has identified the scope for comprehensive redevelopment on a number of key sites to make the significant changes to the area that this 'turnaround' requires. Whilst this is in train, it is a long term project. For example, the Town Centre Study 2016<sup>2</sup> recognises that, with significant changes having taken place since 2010 and more occurring and planned,

<sup>1</sup> DCLG (2015), [English indices of deprivation 2015](#)

<sup>2</sup> LB Newham (2016), [London Borough of Newham Town Centre & Retail Study Update 2016](#)



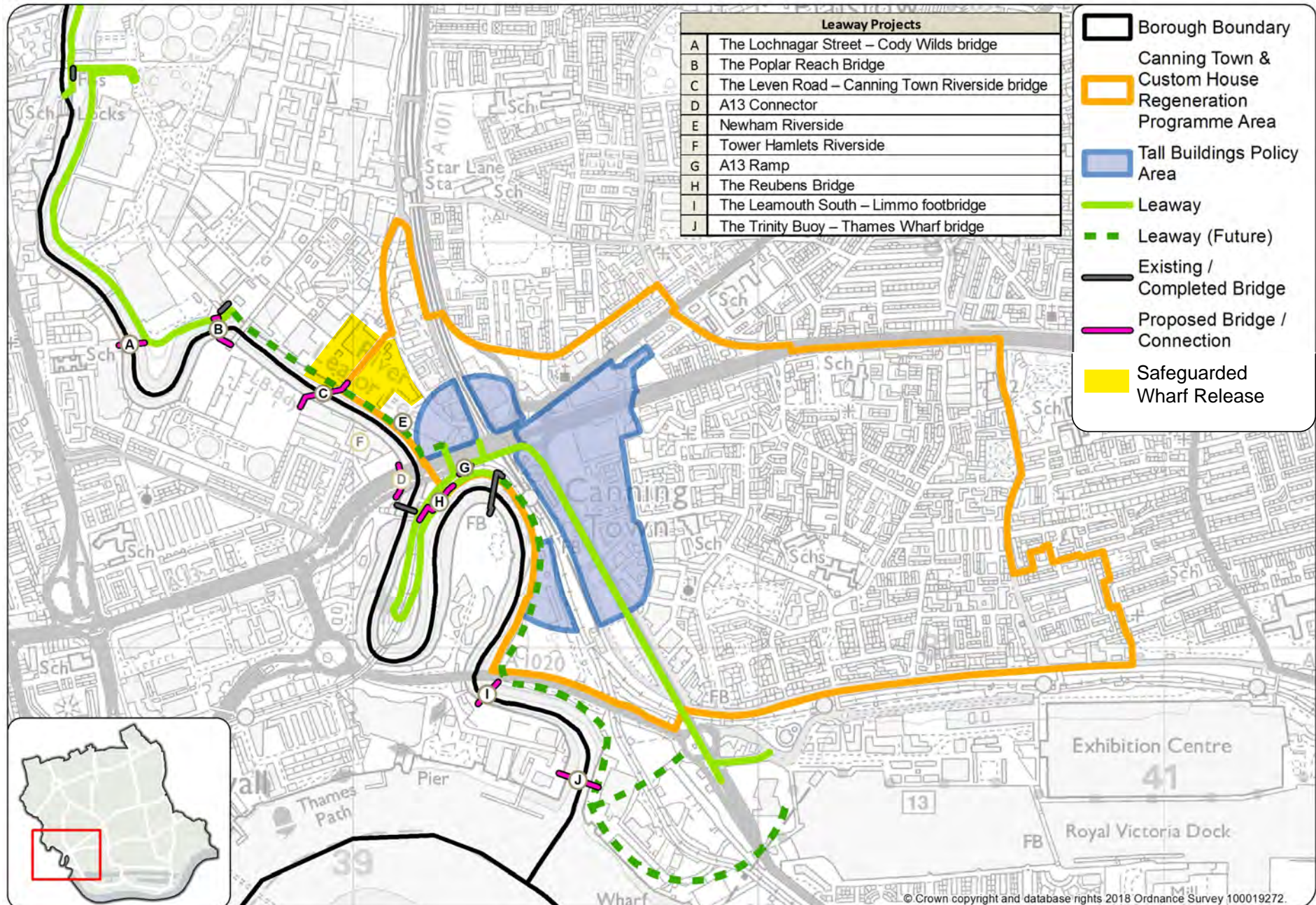
Figure 2.4a - Policy S4a: Canning Town and Custom House



Note: The boundaries on this map, and other fixed lines/areas (i.e. excluding indicative arrows etc.) will be replicated on the Policies Map



**Figure 2.4b - Policy S4b: Inset-Canning Town & Custom House**



Canning Town Town Centre is still in transition. As such this requires a continued emphasis on curation and management of it as an evolving place, employment hub and town centre with Major centre potential. This includes fostering a range of uses, and unit types and scales, including affordable workspace and ensuring the quality and diversity of the offer is well anchored by uses that are likely to pervade, and contribute to an expanded trade draw, dwell time and activation into the evening as well as during the day.

- 5.49 However, the area's spatial planning needs extend beyond the Canning Town and Custom House Regeneration Programme area (see Spatial Policies Map), to the Royal Docks and up the Lower Lea Valley to West Ham. The strategy for the wider area includes activation of the Lea River by delivering the Lea River Park vision, including through appropriately sized and designed green spaces, revaluation of heritage assets, new walking and cycling routes and new bridge links to address both its continuity and connectivity to adjacent neighbourhoods. The masterplanning of Strategic Sites at West Ham and Thames Wharf, (as well as those in between) have key roles to play in this vision, as well as providing new foci for the communities to be created around them at their respective stations via, at Thames Wharf, managed release of the SIL and transfer of wharf safeguarding to the proposed consolidated wharf at Central Thameside West. While Canning Town Riverside also includes two safeguarded wharves, Mayer Parry and adjacent Priors, these have not been in operation for a long time and there are significant operational constraints that would need to be overcome to bring them back into use. Pending the GLA's Safeguarded Wharfs Review, it is expected that these wharves will be released from safeguarding. In the northeast of the area, the Greenway provides important connections as part of the wider green grid to Stratford, Plaistow, East Ham and Beckton, and its enhancement and further connectivity are important strategic objectives. Elsewhere, LMUAs will also provide an important opportunity to diversify and intensify the range of local employment opportunities beyond the main industrial areas and smaller LILs.
- 5.49a There are also significant developments planned at Bromley-by-Bow, and a greater emphasis on residential development in the localities bordering the area, particularly at Leamouth Peninsula, Poplar and Greenwich Peninsula, which may be mutually beneficial if appropriately integrated.

## Implementation

- 5.50 The Canning Town and Custom House Regeneration Programme will deliver the majority of new homes, mostly on publicly owned sites, including substantive Council and GLA owned sites, and the remainder will be delivered through a combination of large and medium sized schemes outside the programme area, though again with substantial public sector land ownership (notably by the GLA), together with other small sites in a mixture of ownerships. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council. The area's many and increasing benefits, notably the arrival of Crossrail and scope for a new DLR station at Thames Wharf, together with wharf consolidation elsewhere, planned public realm, transport interchange, walking and cycling and social infrastructure investment, changes to the town centre to future proof it, and a buoyant industrial market and visitor economy linked to ExCeL, should help provide continued



development momentum.

- 5.51 The policy is in effect the detailed spatial expression of many of the thematic policies in the plan which should be read and deployed in conjunction with it. More detailed guidance and advisory information is also available in relation to the Lea River Park concerning the vision, design codes, and potential connectivity projects<sup>3</sup>, and in the Character Study, Town Centre and Retail Study, the Strategic Flood Risk Assessment, Employment Land Review and Infrastructure Delivery Plan. All these documents can be accessed on the Council's website<sup>4</sup>. The London Heat Map<sup>5</sup> provides further detail with regards to the opportunities of delivering decentralised energy in Canning Town area. Airport safeguarding information and mapping can also be viewed on the council's GIS system<sup>6</sup>.
- 5.51a London Plan policies, and the Mayor's Safeguarded Wharves Review, will also be relevant to assessment of proposals relating to the Mayer Parry Wharf, Priors Wharf and Thames Wharf. Consultation with the PLA is required in relation to proposals for Thames Wharf and any river crossings up to the PLA's navigational limits at the A13.

## Monitoring

- 5.52a See S1, noting that S-OP-1, 2 & 3 and S-OUT-1b can be broken down by CN/spatial policy area.

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<sup>3</sup> Lea River Park Constituent Authorities (2008), [Lea River Park Primer, Design Manual, and Curatorial Approach](#)

<sup>4</sup> LB Newham (2017), [Local Plan development and review](#)

<sup>5</sup> GLA, [London Heat Map](#)

<sup>6</sup> LBN, [GIS mapping](#)

## S5 Beckton

Proposals which address-and where appropriate accord with the following over-arching strategic principles and vision-based spatial strategy will be supported:

### 1. Strategic Criteria:

- a. Deliver a new well-integrated new piece of city whilst accommodating significant transport depot and waste and utilities infrastructure needs, a new internationally oriented hi-tech, knowledge-intensive business district benefiting from Enterprise Zone status, and renewal and improvements to the existing residential and industrial areas, focusing on their strengths as a green, family-oriented neighbourhood and a regionally significant centre for green industry, engineering, warehousing and logistics; and
- b. ~~in~~Major new housing (at least 5278 units) and infrastructure provision and significant numbers of the borough's targeted jobs growth will be delivered primarily on 4 Strategic Sites through partial Managed Release of SIL, acting in concert with those in adjoining neighbouring areas and well integrated with their surroundings, with non-strategic opportunities, including through Managed Intensification, and sensitive infill also being identifiable at locations within the wider area.

### 2. Spatial Strategy:

- a. Beckton Riverside will provide a new hallmark mixed use area, building on the strengths of the riverside location, good strategic road network access, [further] scope to extend MOL, continuous riverside access and optimal pedestrian and cycling permeability, and the established retailer commitment to the location, as well as extensive infrastructure investment yielding new connections including river crossings and station(s) and accessible community facilities commensurate with the scale of development. Gallions Reach Shopping Park will co-evolve and intensify to become a Major town centre for the area focused around a transport hub, in the mix of shops and wider offer provided, the variety of unit sizes, the connections with local residential areas including new housing in vertical mixed use formats within it, and reduction in the dominance of car parking;
- b. Other new residential development, community facilities and small scale business use and a local centre at the station will consolidate the new community developing around Albert Basin, ensuring it is safe, with good connections to East Beckton District Centre, neighbouring UEL and the new neighbourhoods and town centre at Beckton Riverside, and convivial, continuous public space alongside the docks and river;
- c. Royal Albert North will become a new state-of-the-art business quarter of international importance for high-tech, knowledge and cultural driven industries, benefiting from enhanced DLR access connecting with Crossrail, proximity to UEL and the University Technical College, green grid connections to open space and continuous dockside routes;
- d. The East Beckton District Centre will be consolidated at the eastern end close to public transport links, and become less island-based and inward-looking, with an improved public realm, renewal of the convenience offer and a wider array of town centre uses,

and better linkages between the precinct and other shops and services in the area, as well as local neighbourhoods; redevelopment of the adjacent Alpine Way retail park will enhance the centre's vitality and viability ensuring it is more clearly the commercial and community hub for the area, and better manage its integration with the residential development to the east, and successfully manage the transition to SIL to the north;

- e. London Industrial Park and Gemini Business Park will continue to act as a significant component of the borough's industrial offer, reflecting emerging growth sectors notably warehousing and logistics and taking advantage of links to road and river transport and SIL protection requiring their appropriate buffering, whilst through better integration with neighbouring areas, improving their comfort, convenience and permeability for pedestrians and cyclists with onward connection to public transport links and the river; Strategic Sites and to some extent unallocated retail parks offer some potential to relieve pressure on SIL, through the development of modern workspace that is more compatible (than core SIL uses) with other uses;
- f. The 1980/90s suburban estate, with its good access to large areas of green and water space, and community facilities, will continue to provide an excellent location for families, with enhanced and expanded schools and healthcare provision. The area will become increasingly well-connected and legible, through improvements to bus and DLR services and efforts to reduce the barrier effects of the A13, Royal Albert Way, Royal Docks Road and the area's disconnected street pattern together with public realm and natural surveillance improvements, along these and Woolwich Manor Way and in the local parks, securing improved routes to the town centre and the other retail parks in the area, DLR stations, Greenway, and the riverside/dockside and employment areas in between;
- g. Links will also be improved with surrounding areas, with the extension of the DLR network and station capacity enhancements (including platform lengthening), and other new river crossings, and a reduction through design and masterplanning of the barrier effects of the surrounding roads, rivers, docks, railways, industrial areas and retail parks being addressed to connect with neighbouring communities and employment in Barking and Dagenham, East Ham the Royal Docks and across the River Thames;
- h. Heritage assets will be better recognised including gas workers' cottages at Winsor Terrace, and remnants of dock-related buildings, whilst views from the Greenway, to and along the rivers, and to Shooters Hill will be enhanced;
- i. The area will continue to be important for utilities infrastructure, with ongoing investment in the capacity, efficiency and [on and off site] mitigation of environmental and spatial impact at the sewage treatment works, former gasworks, and DLR depot, ensuring that overall development capacity, including in the immediate vicinity, is maximised. Modern waste processing and recycling is also compatible with industrial permissions, and should make use of river transport where feasible;
- j. Low carbon local energy generation and district heating will be typical throughout the area with major developments being required to provide for connection and/or add to existing networks in addition to the provision of significant new energy transmission and ICT infrastructure to meet business, residential and transport needs; and

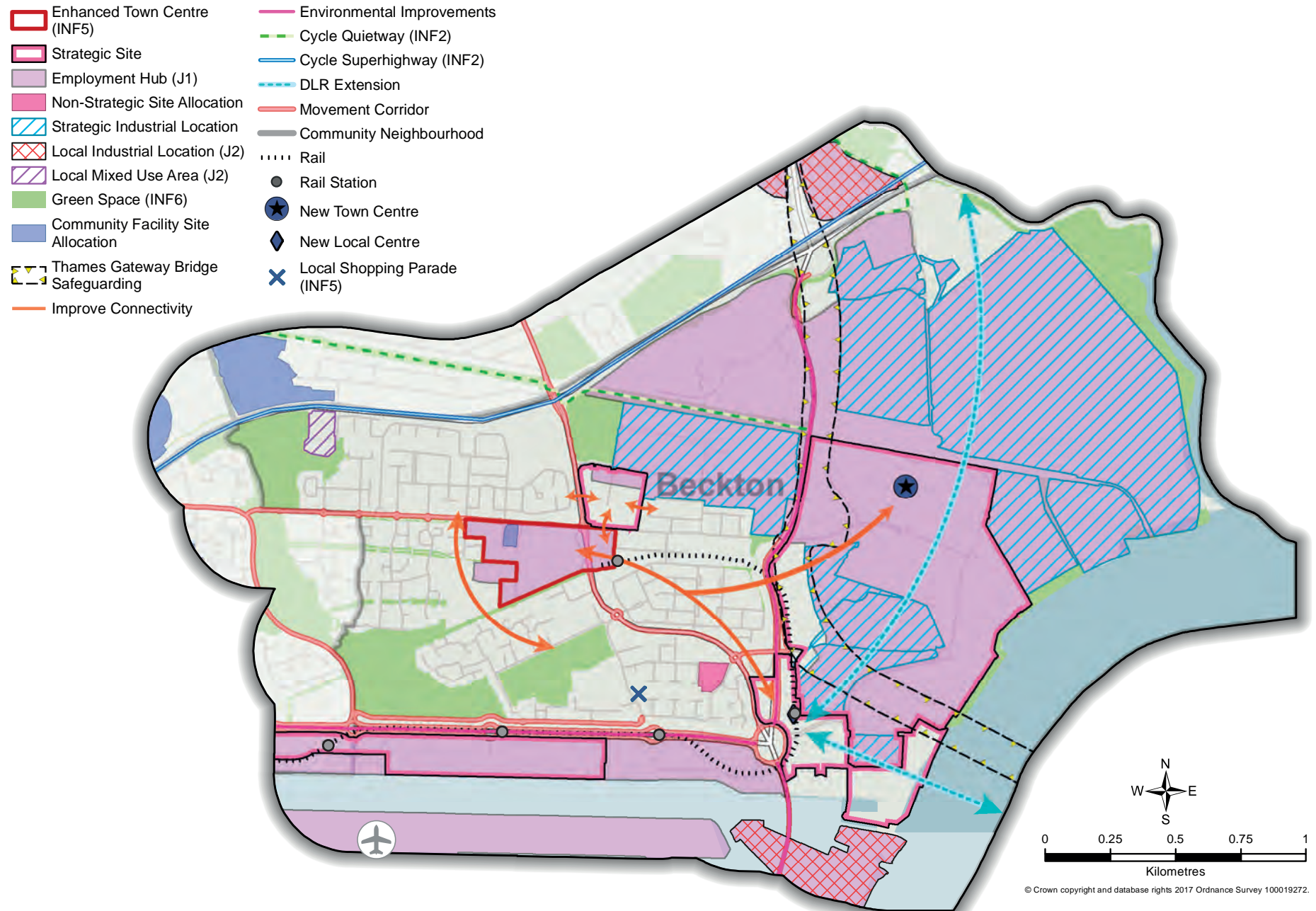
- k. In order to deliver the above vision-based spatial strategy, the following Strategic Sites, as shown on the Policies Map, are allocated for development as set out in Appendix 1:
- S19 Albert Basin
  - S31 Royal Albert North
  - S01 Beckton Riverside
  - S02 Alpine Way

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles; 2.Vision Based Spatial Strategy.

### Justification

- 5.54 Beckton is a large area, but currently has a relatively low population density due to large extents of land being in retail, warehousing, utilities and industrial use, and a deliberate 1980s London Docklands Development Corporation policy of developing newly-drained land for low-rise, family-oriented housing. Flat topography allows for views through to south of the river and Shooters Hill from taller structures. The housing, built to the south of the A13 and north of the Royal Albert Dock, was constructed in four distinct small 'communities', around Savage Gardens, Winsor Terrace and Tollgate Road and to the west of Stansfeld Road, with only remnants of earlier development (e.g. Winsor Terrace and a few Dock-related buildings) remaining. A series of local distributor roads and culs-de-sac serve the houses and flats, and Beckton District Park provides a defining feature which separates three of the communities. A purpose-built District Centre was provided at East Beckton, anchored by a major superstore, whilst further out-of-town retail was subsequently developed in a series of retail parks, the largest being Gallions Reach.
- 5.55 Beckton suffers from a lack of connected streets and severance caused by the park, the A13 corridor and other barriers to the edge of the area including the extensive industrial and retail parks and utilities infrastructure, and the lack of natural surveillance of the district park. North-south pedestrian routes link residential areas with the Triangle Retail Park, but crucial east-west connections between residential areas and the major amenities of Gallions Retail Park, and future access to the Roding and Thames riverfronts are lacking. Given its proximity to the Royal Docks, a lack of public access, use and connection to the dockside is also surprising.
- 5.56 The District Centre provides for little community focus, given that it is primarily based in an indoor precinct and surrounded by a large car park, with a poor relationship with Beckton DLR Station, and the area lacks any Local Centres, with only scattered isolated shops. Gallions Reach, whilst employing significant numbers of people, fails to perform the function of a local high street, and instead provides a wider sub-regional shopping function attracting predominantly car-borne customers. For these reasons, and given further new housing development at Albert Basin, a new local centre is proposed in the south, together with consolidation and improvements to the connection, integration and overall design of other retail provision in the area, which will benefit from Strategic Site development in their vicinity.

Figure 2.5 - Policy S5: Beckton



Note: The boundaries on this map, and other fixed lines/areas (i.e. excluding indicative arrows etc.) will be replicated on the Policies Map

- 5.58 Beckton has cemented its position as the borough's premier industrial location, most recently with the Olympic relocations and investment by existing businesses at London Industrial Park, and development of Gemini Business Park. It is well served by the strategic road network which connects to the M25 via the A13 to the east, Canary Wharf and the City to the west and the A406/M11 to the north. Additionally, the development of Royal Albert North is bringing forward a new business district of international importance, diversifying the employment offer available and stimulating further growth and investment, with further opportunities to capitalise on the Enterprise Zone status and the location's proximity to UEL and the University Technical College (UTC).
- 5.58a The recent decommissioning of the expansive gasworks provides a unique opportunity to deliver a new piece of city in conjunction with the redevelopment and remodelling of Gallions Reach retail park into a town centre to service the growing local population, as part of Beckton Riverside Strategic Site. Substantial constraints remain to be addressed, including contamination, Thames Gateway Bridge Safeguarding, DLR depot growth needs, poor PTAL and connectivity to neighbouring areas, opening up and delivering additional green spaces and riverside access. The delivery of the site will require careful coordination of private and public sector stakeholders, careful phasing in the expansion of the retail park to a town centre in order to retain a balanced town centre network, and timely delivery of extensive infrastructure, including new bus links, a new station, and bridging over the River Roding.
- 5.59 Beckton nonetheless continues to have a significant role as a utilities infrastructure provider for the region, with a major sewage treatment works serving a large part of London, desalination and power plants, waste processing facilities at Jenkins Lane and the DLR depot providing for important strategic transport capacity. The sewage treatment works have undergone improvements recently to tackle odour issues, as part of the Lee Tunnel Project and Beckton Sewage Treatment Works Extension project and other investment continues to reinforce its strategic importance. These include the Thames Tideway Tunnel project, which is proposed to connect to Beckton Sewage Treatment Works by 2018. The sewage treatment works' built form includes a visually dominant sludge-powered generator building and a number of large concrete sludge storage tanks. Whilst these uses are not going to disappear, it is the inevitable consequence of land becoming more scarce and development moving east that such utilities should work harder to ensure their environmental impacts are compatible with closer neighbours, and land take is minimised (see 5.63). The plan also signals via INF3 and S01 Beckton Riverside Strategic Site allocation the need to review waste capacity planning going forward, in light of the New London Plan and evolving development context. Implementation para 5.63 below provides more detail.
- 5.61 Partly as a consequence of the utilities works, and due to large sites awaiting development, the area contains large areas of open land that attract birds and other wildlife, meaning it has various Sites of Interest for Nature Conservation (SINCs), and Metropolitan Open Land designations. However, much of this has limited public access and use, with scope for this situation to be improved with additional green space and connectivity work being undertaken through the masterplanning of Strategic Sites and complementary enhancements of the Greenway.
- 5.61a Existing energy plants, waste resources and waterside sites, together with the scale of



development afford the opportunity to support more sustainable forms of energy generation and distribution, reducing the strain on the traditional grid, and taking advantage of existing network feasibility work, and projects planned and emerging, in line with policy INF4.

## Implementation

- 5.62 Delivery of the spatial vision for Beckton will be through the development of the Strategic Sites, including land in public ownership at Albert Basin. The large Strategic Site at Beckton Riverside will require joint working with TFL on developing options for DLR extensions and a new station, DLR depot and river crossings; and with ELWA constituent boroughs on review of the Joint Waste Plan (see INF3). The Council is also a significant landowner in Beckton and will make best use of its property assets to support the Local Plan objectives for Beckton. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that development opportunities here mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council.
- 5.63 Other works, including sewage treatment works expansion and mitigation are the responsibility of statutory undertakers, with new adjacent development subject to Agent of Change principles set out in policy SP8, J1 and J2. Reducing spatial impacts of utilities and transport infrastructure more broadly will involve use of innovative technologies and formats, including provision for decking and over-development where appropriate.
- 5.64 The policy is in effect the detailed spatial expression of many of the thematic policies in the plan which should be read and deployed in conjunction with it. More detailed guidance is available as part of the technical evidence base that supports these studies including the Town Centre and Retail Study, Strategic Flood Risk Assessment, Employment Land Review, Character Study and the IDP. All these documents can be accessed on the Council's website<sup>1</sup>. The London Heat Map<sup>2</sup> provides further detail with regards to the opportunities of delivering decentralised energy [connections] in Beckton. Airport safeguarding information and mapping can also be viewed on the council's GIS system<sup>3</sup>.

## Monitoring

- 5.64a See S1, noting that S-OP-1, 2 & 3 and S-OUT-1b can be broken down by CN/spatial policy area.

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<sup>1</sup> LB Newham, [Local Plan development and review](#)

<sup>2</sup> GLA, [London Heat Map](#)

<sup>3</sup> LBN, [GIS mapping](#)

## S6 Urban Newham

Proposals that address the following over-arching strategic criteria and spatial strategy will be supported:

### 1. Strategic Criteria:

- a. Achieve a stable, cohesive Web of Opportunity through place curation and improved housing and infrastructure investment, diversification of local employment opportunities, revived town centres and new cultural offers: a place of many places, including gateways, centres, hubs and connections, and large and small breathing spaces;
- b. The economic role of the area will be based on its town and local centres, as well as local entrepreneurship, with LMUAs and MBOAs offering a wide choice of workspace options, particularly for the growing cultural and creative sector;
- c. New housing (at least 7856 new units) and accompanying jobs growth and infrastructure provision will be delivered across the area, partly on Strategic Sites well integrated with their surrounding communities and acting in concert with those in adjoining areas, but increasingly through non-strategic opportunities, including through Managed Transition and sensitive infill close to centres and key corridors;
- d. Population will be stabilised, with a greater focus on improving housing quality, protecting and increasing family housing, and restricting Houses in Multiple Occupation (HMOs) and flat conversions, encouraging de-conversion of family-sized Victorian and Edwardian homes that have been subdivided in the past;
- e. People's experience of moving through the area, particularly North-South will be enhanced through improvements to connectivity, and concerted efforts to upgrade the design and environment of key corridors in line with Policy SP7, further supported by and supporting a shift to more sustainable travel patterns;
- f. Employment will be increased through improvements to town centre vitality and viability, with a focus on accommodating new innovative forms of mixed use development where appropriate, and continuing support for local employment as part of existing successful mixed use areas in line with Policies J1 and SP3;
- g. Infrastructure will be better aligned with community needs in line with Policy INF8, particularly addressing existing deficiencies and capacity issues in relation to schools, health centres and open space, with innovative responses to limited resources and sites; and
- h. Innovation will be called upon to develop new and viable uses for key heritage assets which will be re-integrated with their surroundings and neighbourhoods.

### 2. Spatial Strategy:



**a. Forest Gate**

- i. Forest Gate town centre will become an attractive and vibrant centre, retaining its urban village feel founded on established independent shops, arts and cultural activity and revitalised heritage assets. Further cafes and restaurants, community facilities, and retail variety, including a small to medium-sized foodstore, will add to the mix and quality of offer. Alongside commercial uses, new town centre housing will extend safer, more convivial activity into the evening. The town centre environment and new development will complement, integrate with and reinforce its attractive heritage identity and popularity of local neighbourhoods, and facilitate a better north-south integration of the centre across Romford Road, building on the opportunity presented by Crossrail and identified development sites; and
- ii. Elsewhere in Forest Gate, town centre and Crossrail regeneration benefits will be spread into local neighbourhoods, with new development driving an upgrade to the public realm, and better management of traffic and congestion, particularly to transform the environment of key movement corridors of Romford Road and Woodgrange Road/Upton Lane; conservation and enhancement of its heritage assets including Victorian and Edwardian housing; and the provision of new open space. Accessibility to local employment will be further improved through intensification and small scale change at the town centre fringes and nearby mew and railway arches in areas identified as MBOAs, LMUAs and LILs. Most change, with the capacity for innovation, is likely to be focused on sites near the station, within tired post-war estates, and on parts of major routes, particularly Romford Road. Development within the setting of West Ham Park and Wanstead Flats will complement and enhance views from these spaces, and promote access to them.

**b. Manor Park**

- i. Manor Park will see most change around the new Crossrail station which will gradually redefine and reinvigorate Manor Park local centre, creating a more significant focus to the area for the local community; and
- ii. Associated regeneration benefits and smaller windfall sites will contribute to improvements in the public realm, including open space provision and conservation and enhancement of heritage assets, both along key movement corridors of Forest Drive/Station Road/High Street North, Romford Road, and Plashet Grove/East Avenue/Browning Road/Church Road/Little Ilford Lane where they can contribute to legibility, and within residential areas where they can contribute to the desirability of the area to live in. Accessibility to local employment will be further improved through new development in MBOAs, LMUAs and LILs identified along Romford Road and High Street North, and improved access to opportunities in Ilford and Barking. Most change and innovation will be focused along key routes where character and enclosure has been eroded. Development in the vicinity of Manor Park's cemeteries and Wanstead Flats will complement and enhance these spaces, promoting access to them.

**c. East Ham**

- i. East Ham town centre will continue to be important within the borough as a whole, with recognised heritage assets, employment, civic and community spaces, good accessibility by bus, foot and tube, and vibrancy and popularity added by its independent shops as well as a range of multiples. Through new development particularly in the southern part of the centre, as well as renewal of existing floorspace, the centre will provide a better quality and mix of offer during the day and into the evening within an improved public realm that better manages pedestrian flows, has attractive gateways and revitalised and enhanced heritage assets. Complementary high density residential development will make use of the public transport accessibility, which will be enhanced with step-free station access. The town centre will be less linear, with primary activity spreading out towards its wider boundaries including an enhanced street environment at Ron Leighton Way, and clearer delineation of its boundaries; and
- ii. Elsewhere in East Ham, most change will be focused on windfall sites along main roads, particularly Barking Road and High Street North and South, contributing to their improvement as movement corridors. There will be more general emphasis on conservation and enhancement of the residential environment and valued open space, attending to open space deficiencies in the centre of the area through green grid connections to existing spaces and opening up and activating Metropolitan Open Land in the east. Development within the setting of the Greenway will complement and enhance views from, and promote access to it. Local employment will be further improved through new development at and improved access to the LILs in Jenkins Lane and Folkestone Road and MBOAs near the town centre, as well as employment areas in neighbouring Barking and Ilford.

#### d. Green Street

- i. Green Street town centre will maintain its specialist ethnic retail identity with a local to international draw, popular market place and independent shops and quality evening offer that continues to evolve. This will demand innovation in design and formats, a consistently high quality environment and the development of complementary employment to help reinforce its distinctive character, with a mix of quality shops and services that meets both local and specialist needs. Queen's Market will continue to be an important meeting place for the local community as at present, reinforced through co-location of other community uses, and with development densities commensurate with its public transport accessibility that will be enhanced through step-free access to the station; and
- ii. Elsewhere in Green Street, most change with scope for innovation will be focused along the key movement corridors of Barking Road, Plashet Road/Plashet Grove, Kathrine Road, Green Street/Central Park Road and Romford Road, and in tired post-war estates, with a more general emphasis on the enhancement of legibility, movement experience and the residential environment, including the provision of new open space and protection of key Local Shopping Parades. The redevelopment of Upton Park football ground will significantly boost the southern part of the area providing new housing choice, modern flexible community facilities and renewed public spaces. Development within the setting of West Ham Park will complement and enhance views from the park, and promote access to it.

**e. Plaistow**

- i. Plaistow will gain a new focus through the development of a local centre around the natural attraction of the station, complementing that at Greengate, with consolidation of other Local Centres as necessary, continuing to protect other key local shops and services as Local Shopping Parades. Most of the new development will be in the vicinity of the station and main roads, including LMUAs at Dulcia Mills and Ashburton Terrace, with good public transport accessibility (enhanced by step-free station access) and the need for enclosure reflected in appropriate densities and building heights; however, most post-war estates also present opportunities for change, incorporating improvements to connectivity. Innovation will be called upon to develop new and viable uses for key heritage assets which will be re-integrated with their surroundings and neighbourhoods, with development within the setting of West Ham Park and the Greenway complementing and enhancing views from these, and promoting access to them. Newham University Hospital will be an important employment hub in the health, community and education sectors.

**f. Strategic Sites**

In order to deliver the above vision-based spatial strategy, the following Strategic Sites, as shown on the Policies Map, are allocated for development as set out in Appendix 1:

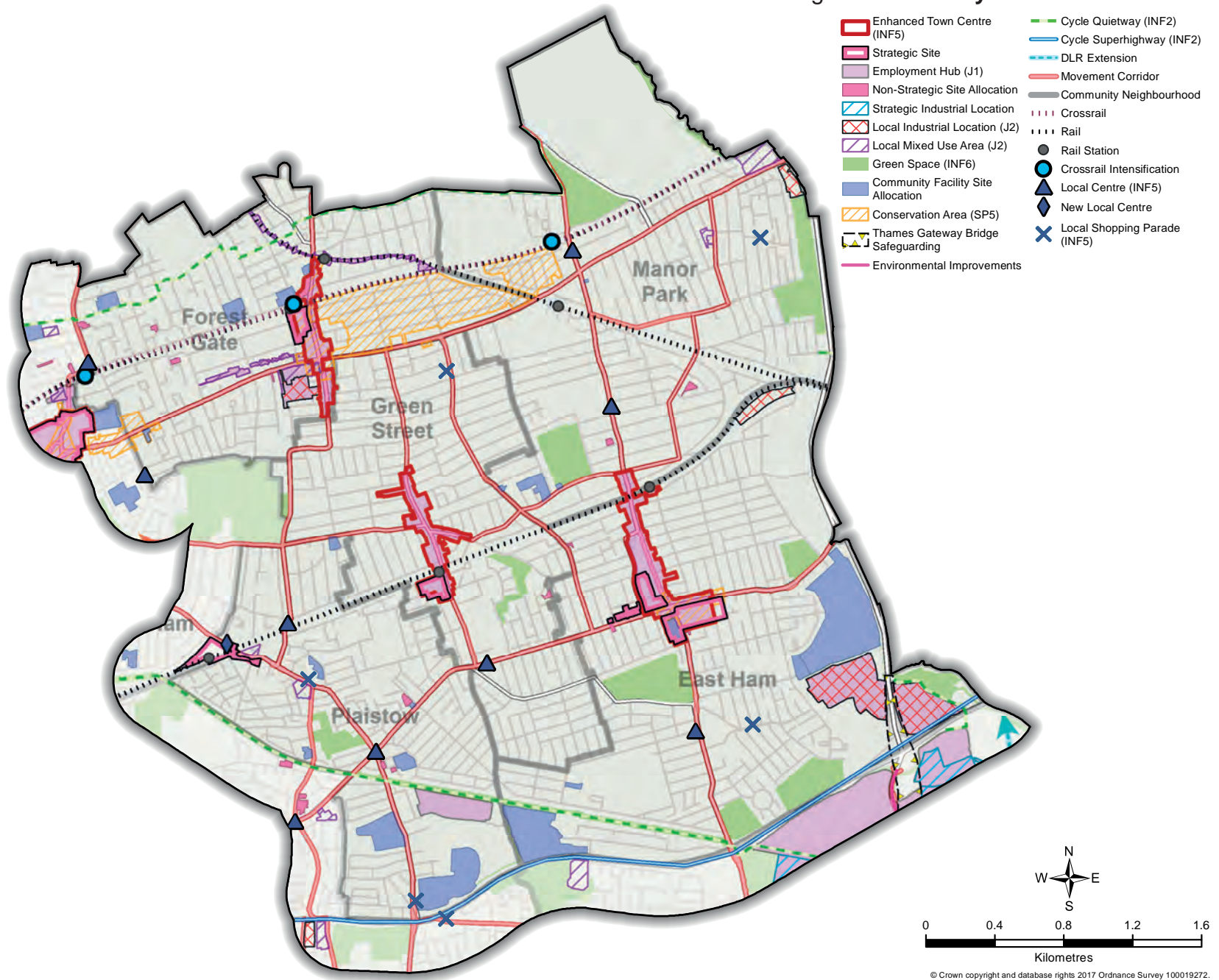
S24 Woodgrange Road West  
S25 East Ham Market  
S26 East Ham Town Hall Campus  
S03 East Ham Western Gateway  
S27 Queen's Market

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles; 2.Vision Based Spatial Strategy.

**Justification**

- 5.66 Urban Newham was built largely at the end of the 19th century and beginning of the 20th century as a neighbourhood for city workers, with access to central London via the rapidly expanding railway and horse tram network. The area is characterised predominantly by its rows of densely packed terraced dwellings. The area also contains a number of important parks, including West Ham Park, Central Park and Manor Park Cemetery and the City of London Cemetery (a grade I Historic Park) which fit into the urban structure. During the war, bombing raids created large gaps in the urban fabric, which were subsequently redeveloped for social housing in the 60s and 70s. Recent change has included estate-based renewal, redeveloping high rise point blocks and other problematic post-war housing to lower rise, high density housing. Other change has tended to be incremental – making the most of infill opportunities as they have arisen, (e.g. on surplus railway land and former small scale industrial sites) often increasing local densities due to an increase in taller, flatted development.

Figure 2.6 - Policy S6 Urban Newham



Note: The boundaries on this map, and other fixed lines/areas (i.e. excluding indicative arrows etc.) will be replicated on the Policies Map



- 5.67 The issues and opportunities described in the introduction to this plan are writ large over this existing built up area. In brief, the quality of development in much of the area is reflected in the proportion of the borough's Conservation Areas and areas of townscape value and the potential for further designations. Public transport accessibility is generally good, with excellent tube connections with central London, Stratford and Barking. The coming of Crossrail in 2018/19 will open up more opportunities for development in Forest Gate, Manor Park and Maryland. This development will in turn enable the strengthening of the associated Town and Local Centres. These already exhibit local entrepreneurialism – as evidenced by activity in the centres and their fringes – and the borough's most popular parks (Central Park, West Ham Park) are in this area or at its edge. Most development opportunity is focused in Town and Local Centres as retail and local infrastructure requirements change, and through redevelopment of other non-strategic and windfall sites, notably in LMUAs where managed transition to employment-led development more compatible with their residential contexts is expected, providing finer grained local employment as well as new homes.
- 5.68 However, north-south public transport connections are comparatively poor, with problems of congestion in particular. Likewise, features of design quality evident in earlier development were not carried through into the quality of post-war, notably 1960s and 70s development, which is particularly affected by substandard housing and a lack of permeability. The quality of the public realm and movement corridors more generally in much of the area is also poor, affecting people's enjoyment of the pedestrian environment, levels of cycling and their overall impression of the borough. Town Centres have been adversely affected by a proliferation of takeaways and betting shops, changes in shopping habits and the sub-regional offer, and general low levels of affluence, which in turn reflect high unemployment and inactivity rates. These factors, together with concerns over crime and grime, real and perceived deficits in the quantity and quality of community infrastructure including open space, high levels of subdivision of larger, more desirable properties, and significant proportions of new developments comprising smaller flats have contributed to high levels of population churn.
- 5.69 This policy seeks to address these issues and using the Character Study analysis to help direct change to contribute to and reinforce the distinctive identities of different places. While the size and density of development land in Urban Newham is more limited than in the Arc of Opportunity, the strategic and non-strategic sites identified, together with other designations, create a web of opportunity to cumulatively deliver transformative change in this part of the borough.

## Implementation

- 5.70 The Council is a significant landowner in Urban Newham and will look to work with partners, adjoining landowners, local businesses and business groups and developers to bring regeneration and renewal to centres at East Ham, Green Street and Forest Gate, and where other opportunities arise to provide new/improved schools, community facilities or open space. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council.

- 5.71 The Local Implementation Plan sets out the Council's programme for investment in highways and public space to support its regeneration objectives for Urban Newham. See also Policy SP7.
- 5.72 The Council will use its other powers of enforcement, environmental health and town centre management to raise the quality of centres and manage the built environment in accordance with this policy.
- 5.73 The policy is in effect the detailed spatial expression of many of the thematic policies in the plan which should be read and deployed in conjunction with it. More detailed guidance and advisory information is available as part of the associated technical evidence base including the Town Centre and Retail Study; the Employment Land Review; the Strategic Flood Risk Assessment, the Character Study and the IDP. All these documents can be accessed on the Council's website<sup>1</sup>. Airport safeguarding information and mapping can also be viewed on the council's GIS system<sup>2</sup>.

## Monitoring

- 5.73a See S1, noting that S-OP-1, 2 & 3 and S-OUT-1b can be broken down by CN/spatial policy area.

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<sup>1</sup> LB Newham, [Local Plan development and review](#)

<sup>2</sup> LBN, [GIS mapping](#)

# SP1 Borough-wide Place-making

Development Proposals, including proposals for meanwhile uses which address the following strategic criteria and spatial strategy will be supported:

## 1. Strategic principles

- a. High quality development will be expected, which respects, takes advantage of, and enhances the positive elements and distinctive features of the borough, contributing to a well-connected and integrated series of successful and distinctive mixed use places, that together help to transform the borough and its attractiveness as somewhere to live, work and stay; and
- b. Development should help deliver the Council's duty to promote community safety.

## 2. Spatial strategy

- a. The following spatial features should elicit a design response in the creation of mixed use places:
  - i. Topography, landforms, river corridors, green networks, important habitats, waterways, woodlands, other natural features and open spaces;
  - ii. Views and vistas to landmarks and skylines both within and outside the borough and including the River Thames and from and to new buildings and places;
  - iii. Heritage, cultural and infrastructural assets in line with Policy SP5;
  - iv. 'Edges' and severance between different parts of the borough and neighbouring areas; and
  - v. Other local features that can contribute to the creation of successful distinctive places, or the absence of them and the need to create them.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles.

## Justification

- 6.2 Creating successful places is the lynchpin of the Plan's key objective to create a borough where people choose to live, work and stay, as well as being identified as important at a London-wide and national level. This policy and definition of place-making defines the macro-level ingredients that relates to how a place looks, feels and works for day-to-day personal, social and economic activity, together creating viability, flexibility, stability, safety and security, sociability, inclusivity, healthiness and environmental sustainability. It is

applicable as much to proposals for 'meanwhile' uses, as more permanent ones; as such uses often prevail, and therefore have a significant impact in relation to the realisation of wider community visions. The policy thus supports the other objectives of the plan to optimise development and to deliver growth in cooperation with Newham's strategic partners most notably the Greater London Authority.

- 6.3 Building on the existing built environmental assets in the borough, the policy brings together all the different layers of a place which together are agreed to form the basis of lasting regeneration, with the principle of mixed use across an area at its heart. While there are many existing strengths, many of these components (or the relationship of development to them) are in need of improvement or adjustment according to local people and other stakeholders.
- 6.4 Within a sizeable borough such as Newham, it is reasonable to expect a number of places of a scale that people can easily relate to and interact with in their day-to-day lives, that should be integrated and connected in a manner which recognises that one place is unlikely to fulfil a person's needs in their entirety, and that people expect to be able to move freely and easily within an extended area. This is a key issue in the borough due to physical barriers and poorly conceived urban structure and street networks, contributing to the creation of harsh 'edges' rather than smooth transitions between areas.
- 6.5 The distinctiveness of these places matters: positive distinctive identities are not only generally pleasing and conducive to creating a sense of somewhere people value and can feel they belong to, but also aid navigation across the wider area, and more fundamentally, boost economic competitiveness and robustness. It ensures places have a unique offer so that they draw on a particular segment of the market and locally-specific strengths and opportunities, whilst addressing locally-specific weaknesses and threats, creating a borough that is stronger as a whole. This is why clear visions for places based on an analysis of character are important, recognising the need to address their coherence with a view to reinforcing or creating positive identities – again a key issue in Newham.
- 6.6 This policy therefore directly relates back to the Vision - that Newham should be covered by a more coherent and comprehensive range of readily identifiable, connected and integrated successful places.

## Implementation

- 6.7 Place-making is equally applicable to existing Urban Newham as to the urbanising Arc of Opportunity. Developers will be expected to demonstrate that the composition of their proposal is worked up to incorporate the above ingredients of successful, connected and distinctive places in Design and Access Statements. The starting point for these should be the latest Character Study as well as more detailed site context analysis, and any other area-specific guidance.
- 6.7a Expert advice will be taken to support assessment of these, from Design Review Panel, Environmental Health, Community Safety and Design Officers as well as external partners such as the Metropolitan Police and London Fire Brigade.
- 6.8 The Council and its partners will demonstrate leadership to this end in the conception and



implementation of major regeneration and redevelopment projects co-ordinating development on as large a scale as possible, where appropriate, issuing place-making design guidance (e.g. that relating to the Lea River Park) and developing projects that deliver complementary measures.

- 6.9 Comprehensive development and masterplanning as per S1 will help achieve large scale successful place-making that delivers new distinctive but integrated and well-connected places.

## Monitoring

- 6.9a The monitoring framework includes specific performance indicators relating to place-making upon which the relevance and efficacy of Policy SP1 will be assessed. Outputs relate to place-making support in planning, regeneration and through complementary measures and will be drawn from general activity reporting (e.g. S106 monitoring) and should be monitored annually. Place-making is difficult to measure, so outcomes are necessarily proxies monitored through corporate surveys which take place on a regular cycle. Ongoing informal engagement with residents and elected members also provides useful feedback on place-making issues, and has been used for instance to inform the updated Character Study.

6.9b Indicators:

- i. SP-OP1 Place-making support
  - a. Up to date Character Study and other extant locally-specific place-making guidance where relevant. [up to 5 years old] ;
  - b. Environmental Improvement schemes implemented [No specific target] ;
  - c. Developer contributions for environmental improvement schemes [no specific targets, monitor for ongoing commitment to improvements and adequate mitigation];
- ii. SP-OP8 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];
- iii. SP-OUT1 Successful Place-making:
  - a. Crime and fear of crime [No specific target, should be improving];
  - b. Satisfaction with the area [No specific target, should be improving].

## SP2 Healthy Neighbourhoods

Development proposals which address the following strategic principles and spatial strategy, and technical criteria will be supported:

### 1. Strategic Principles and Spatial Strategy:

- a. The Council supports health care partners' efforts to promote healthy lifestyles and reduce health inequalities and recognises the role of planning in doing so through the creation of healthy neighbourhoods and places. In Newham, this will be achieved through responding to the following contributors to health and well-being:
  - i. The need to promote healthy eating through taking into consideration the cumulative impact of A5 uses (hot food takeaways) as per SP9;
  - ii. The need to improve Newham's air quality, reduce exposure to airborne pollutants and secure the implementation of the Air Quality Action Plan, having regard to national and international obligations as per SP9 and SC5;
  - iii. The need to improve employment levels and reduce poverty, whilst attending to the environmental impacts of economic development including community/public safety, noise, vibrations and odour and the legacy of contaminated land as per SP8 and SC1;
  - iv. The need to improve housing quality and reduce crime, insecurity and stress and improve inclusion through better urban design and housing mix as per H1-4, SC1 and SP3;
  - v. The need for new or improved health facilities, (as per INF8) and importance of protection and promotion of local access to health and other community facilities and employment, including sources of fresh, healthy food in line with Policies SP6, SC1, INF8 and INF5;
  - vi. The importance of facilitating and promoting walking and cycling to increase people's activity rates as per INF2;
  - vii. The need for new or improved inclusive open space and sports facilities, including good quality, secure and stimulating playspace and informal recreation provision for young people and accessible natural greenspace and bluespace to encourage greater participation in physical activity and provide relief from urban intensity, as per INF6 & 7; and
  - viii. The role of Newham University Hospital as a key provider of clinical care and expertise, employment and training provision.

### 2. Design and technical criteria:

- a. The requirement for major development proposals to be accompanied by a health impact

**assessment detailing how they respond to the above contributors to health and well-being, including details of ongoing management or mitigation of issues where necessary.**

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles and Spatial Strategy.

### **Justification**

- 6.11 Improving health and well-being is one of the main priorities identified in Newham's Sustainable Community Strategy, and national and London-wide planning policies, which recognise the relationship with socio-economic and environmental factors. This policy therefore has an important role in achieving the Plan's overarching objective of creating high quality places and delivery of resilience and convergence of outcomes. The health status of Newham's residents is, in general, worse than the London average due to a higher mortality rate from circulatory diseases and diabetes, lower than London average life expectancy, poor cancer survival rates and high incidence of respiratory illnesses and mental health problems. Newham suffers from poor air quality and fails to meet national air quality standards, which impacts on human health particularly the old, the young and those with existing lung and heart conditions. Newham also has one of the highest rates of physically-inactive adults and one of the highest rates of obese children in London. Limiting long-term illnesses are also prominent within the population. There is an urgent need to improve people's diets and physical activity rates, reduce stress levels, exposure to environmental pollutants and ensure that everyone can enjoy opportunities on offer, whatever their ability.
- 6.12 Planning by delivering growth and optimising development in accordance with the overarching objectives of the Plan can play a crucial role in addressing these issues, and Newham has a unique opportunity in terms of the development land opportunities in the borough, enabling the principles of healthy neighbourhoods to be incorporated in new neighbourhoods from the start, clean-up of contaminated land and a shift to cleaner, greener industries and logistics, and getting more people into work, which have a crucial link to ill health. However, it will also be important to improve existing neighbourhoods, where much of the population will continue to live, as these are progressively re-shaped over time.
- 6.13 Across much of the borough the number of hot food takeaways and relatively poor availability of healthy food remains a cause of significant public concern, with key links made with children's and adult health, as well as wider amenity issues. The cumulative impact map of the borough in respect of hot food takeaways shows extensive areas of saturation (see SP9 and associated evidence base). Planning has come forward as an important agent in tackling the number of hot food takeaways in Newham by controlling their spatial distribution so minimising their impact on public health particularly in relation to schoolchildren. Young people's access to such food, and the dietary patterns with health consequences that are established at a young age are an acknowledged concern at national level.
- 6.13a The converse of this, more positive planning for local and inclusive accessibility to quality

facilities and amenities, providing for physical activity, access to nature, healthy food, healthcare, not only increases the likelihood of people benefiting from such facilities with indirect and direct health consequences by reducing psychological barriers to access, but also increases the likelihood they will use them by fitness-contributing, and pollution-reducing active travel modes. It can also help address people's work/life balance by reducing the time needed to access essential goods and services.

- 6.13b In the context of the need to increase employment in Newham, greener industries, and measures to address noise, air and odour pollution and other environmental impacts of economic development are particularly important. This is because the area has long been a favoured location for 'dirty' industries and utilities, due to originally being outside the City of London's stricter jurisdictions. These continue to impact on the local environment and people's health, both directly (contributing to environmental pollutants and stress) and indirectly (e.g. preventing people's enjoyment of stress-alleviating open space).
- 6.13c This is also the case in respect of a legacy of relatively poor quality housing, or management or unmitigated local environments that have resulted in it becoming so, together with poor design or wider neighbourhoods. Housing quality is known to have direct and indirect effects on physical and mental health and well-being through impacts on temperature, exposure to mould and pollutants, security, ability to meet changing household needs, and the ability to provide stress alleviation (spaces of retreat and safety). Appropriate housing mix, including specialist housing, a range of sizes and tenures will also be important to address these contributors to health.

## Implementation

- 6.13d This policy is over-arching, drawing together the elements of healthy neighbourhoods promoted across the Plan, and the importance of taking a proactive and holistic approach to health impacts, seeking to maximise the impact of interventions of other partners where possible. As such, implementation is generally through the deployment of other policies signposted, notably SP9 for management of cumulative impacts, and SP8 for management of externalities.
- 6.14 Access to healthy food may be promoted through planning by protecting the viability, vitality and diversity of Town and Local Centres, isolated shops, or clusters of shops which fill in gaps between designated centres, ensuring most people are within a 5 minute walk of a shop in line with Policies SP6 and INF5. Allotments and community food growing projects on opportunity sites (sites awaiting development, and Strategic Sites) may also contribute to this agenda (see Policies INF7 and SC1 and the Infrastructure Delivery Plan (IDP). These principles, and access to other community facilities (e.g. schools, health care, community meeting places, open space, playspace and parks) and employment defined as ideally within a 400-800m distance of people's homes (a 5-10 minute walk) are also taken forward by INF8, INF7 and spatial and jobs policies which promote mixed use areas.
- 6.15 For this reason, the trade-offs between the provision of more centralised, economically efficient, modern and specialist facilities, and retention of local facilities, need to be carefully considered. Equally however, attention to the quality of walking and cycling links between housing and facilities is important, as distance is not the only factor in encouraging active travel. This includes providing for quieter routes that are less exposed to high traffic levels and hence air pollutants, though also trying to reduce polluting travel

modes on all roads through encouraging sustainable freight and cleaner engine technologies, as per INF1, INF2 & SP7

- 6.17 Quality housing in health terms means minimising exposure to pollutants by adequate spacing from main roads and dual aspect ventilation; providing for good insulation to tackle warmth and damp issues; good space standards (internal and amenity) to reduce stress, with the particular implications this has for housing density; flexibility to respond to changes in household circumstances (children, ill health and disability) and climate change (appropriate temperature management and protection from extreme weather); and safe and secure design – also in the wider neighbourhood (as per SP3, H1, H4, H3, SC1). A certain proportion of specialist units to meet particular healthcare needs will also be important, with inclusion more generally promoted through an appropriate housing mix as per H3, H2, H4 & H1).
- 6.18 Beyond the home itself, in addition to those already discussed, health contributors will include better design of mixed use areas to minimise and mitigate externalities of economic activity including appropriate separation and buffering of uses, restrictions on further intensification of uses, and [retrospective] mitigation, with further detail set out in SP8, SP9, and SC policies. This will be particularly relevant in the consideration of any further airport expansion as per Policy INF1. The current Air Quality Action Plan and Public Safety/Health and Safety Zones around the airport and hazardous installations should also be complied with or addressed as appropriate as per SP9 and SC5.
- 6.19 The process of Health Impact Assessment (HIA) can help to scope and address health impacts in a systematic way for larger developments. Developers will be expected to conduct an HIA for Major residential /mixed use proposals, or address its scope in their Design and Access Statements and Environmental Impact Assessments.
- 6.20 Health care and community partners and the Council will promote complementary lifestyle and business measures, to ensure people benefit as much as possible from changes to their environment.
- 6.21 Implementation of the Air Quality Action Plan by the Council and relevant partners, reviewing and updating it as necessary.
- 6.22 The Infrastructure Delivery Plan and ongoing needs assessments will ensure that health infrastructure needs are addressed through new and improved health infrastructure, as per INF8.
- 6.23 Further expert advice is available from health care partners (currently Newham CCG) and the Council's Public Health Team as well as the guidance from the London Healthy Urban Development Unit (HUDU)<sup>1</sup> and updates as appropriate. This will also be drawn upon in the assessment of planning applications, alongside input from environmental health and design colleagues.

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<sup>1</sup> <https://www.healthyurbandevelopment.nhs.uk/>

## Monitoring

6.23a The monitoring framework includes specific performance indicators relating to Healthy Neighbourhoods upon which the relevance and efficacy of Policy SP2 will be assessed. The outputs for the Healthy Neighbourhoods policy will be extracted mainly from decision making and statutory procedures in planning development management and enforcement, licencing and environmental health. The outcomes will be assessed in the Joint Strategic Needs Assessment, the Newham Survey and Newham Health Team reports.

### 6.23b Indicators

- i. SP-OP2 Healthy Urban Planning:
  - a. No. of new takeaways permitted [no specific target: monitor for evidence of downward trend or sustained low levels];
  - b. Unresolved public health/environmental health objections [No specific target: should be minimal];
- ii. SP-OP3 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny];
- iii. SP-Out-2 Healthy Urban Planning:
  - a. Mortality rate;
  - b. Rates of physical activity, childhood obesity and mortality linked to circulatory diseases;
  - c. Air Quality Exceedances;

[All to be monitored against London average where possible; otherwise monitor for appropriate trends in line with IIA objectives].

## SP3 Quality Urban Design within Places

Proposals which address the following strategic principles and spatial strategy and technical criteria will be supported:

### 1. Strategic principles and spatial strategy

- a. The expectation that all development realises a high quality of urban design in the new buildings and spaces created, helping to engender safe, sociable and inclusive mixed and balanced communities and places that people feel proud of;
- b. The importance of contributing to the creation of, and continued support for, genuinely mixed use areas with an integrated range of high quality accommodation for living, community facilities and work places, ensuring easy and inclusive access to these and associated walking, cycling and public transport links;
- c. The need to avoid problems related to 'bad neighbour' uses, (including hot food takeaways) vacant premises and inactive frontage, flood risk and cumulative impact;
- d. The importance of minimising environmental impact, with sustainability features incorporated into buildings, spaces and neighbourhoods at an early stage of the design process in line with Policies SC1-5;
- e. The importance of an analysis of local character and the specific attributes of the site, seeking to reinforce or create positive local distinctiveness, whilst securing integration and coherence with the local context including character assets in line with Policy SP5;
- f. Respect for sensitivity to and capacity for innovation in different parts of the borough, and the need for appropriate stakeholder and community engagement to help direct responsive design;
- g. The desirability of making the public realm attractive as a social meeting place to be enjoyed by the whole community, and of creating a sense of safety and security and helping to prevent crime and antisocial behaviour inside and outside buildings and in public spaces; and
- h. The importance of providing legible, connected networks of streets, spaces and parks conducive to travel on foot or by bike.

### 2. Design and technical criteria

- a. Any new development, town centres, public spaces, transport hubs and streets should incorporate the principles of and achieve Secured By Design (SBD) accreditation; and
- b. Designs should be accompanied by sufficient technical and financial detail to demonstrate that a satisfactory design quality will be realised and sustained, including provision for continuity of the project architect to completion stage, and details of proposed public realm and open space management and maintenance.



For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles and Spatial Strategy.

## Justification

- 6.25 Quality urban design is a crucial component of creating successful places and communities in terms of their popularity and stability, healthiness, safety and security, sociability, inclusivity, cohesion and economic viability. This is one of the overarching objectives of the Local Plan, in addition to good design that supports the other objectives of optimising development and delivering growth. It is widely acknowledged that good design is at the basis of successful regeneration initiatives. A robust, comprehensive and locally-specific design policy which applies to all scales and types of applications (including advertisements, telecoms, and householders) is vital in this context given that despite support for good design at national, London-wide and local policy level, amongst some better and award-winning schemes in Newham, poorly conceived ones also continue to be put forward. Moreover, research<sup>1</sup> shows that the cost of good design is minimal compared to the financial and other benefits that can be achieved through it. Importantly, good urban design comprises attention to a number of components: not just individual buildings, but also the spaces around them, the relationship with the surrounding area and connections between them, and the mix of uses provided for (which in turn impacts on those spaces). As such the policy emphasises that it is insufficient to address only certain aspects of design: it is expected that all aspects will be addressed, and carried through into credible plans for implementation and management.
- 6.26 Good design must encompass the balance and configuration of uses and connections in an area that have implications for accessibility and travel time, road safety and efficiency, efficiency of land use and management of flood risk, flexibility over time, activation of spaces, safety and security, legibility, amenity and attractiveness. It is thus vital that design initiatives are considered on an area basis rather than a singular building or plot basis, in order that cumulative impact on these matters are properly considered, and that land uses are configured to best strategic effect. Failure to do so can erode legibility and is often unsuccessful, as reflected in the numerous poorly located and frequently vacant ground floor commercial premises in Newham, creating inactive frontage and hostile street level environments, and concern about congregations of unmitigated 'bad neighbour' uses, notably takeaways and bars (See SP9). Good design requires careful strategic planning in order to balance noise-sensitive uses and viable but noisy industry, and to address flood risk – so that responses (e.g. elevated ground floors) do not cause problems of their own (e.g. inactive frontage). Temporal considerations may also apply – ensuring that development plots or premises that are vacant awaiting construction or occupation are activated through 'meanwhile' uses that bridge the gap to longer-term visions.
- 6.27 However, also important is the range, quality, sustainability, accessibility and integration of design responses provided in an area, ensuring that there are choices available that reflect diverse and changing needs and aspirations, whilst avoiding social segregation, contributing to community inclusivity, mix and stability which are key Council priorities.

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<sup>1</sup> CABE, 'The Value of Good Design'; CABE, 'The Cost of Bad Design'



Design quality considerations include the durability of materials and the appropriate scaling and configuration of circulation and communal space; features relating to fitness for purpose including adequate living, storage and amenity space and privacy, the ability to alter and extend internal spaces, natural lighting and ventilation; and the extent to which buildings and spaces 'delight' - e.g. are pleasing to the eye. Environmental sustainability considerations include energy and water efficiency, waste management and incorporation of green infrastructure, including sustainable urban drainage and tree planting.

- 6.28 The design of individual buildings and spaces is a vital part of successful place-making. Design should not be 'off the shelf', but respond to an analysis of the local context so that it has the best impact, responding to the positives and negatives of local character (natural, physical, social and cultural) and addressing the specific constraints and opportunities of the site. It should resolve rather than repeat past mistakes, whilst accentuating and integrating with the positive without simply replicating it. This process includes consideration of aspects of sensitivity which must be attended to (e.g. historic assets and their settings, whether the location is an important local meeting place) and capacity to absorb innovation. The latter is generally greater in the Arc of Opportunity on larger sites, but is also relevant in relation to under-performing assets. For larger sites and/or those that are more sensitive, a proportionate amount of community and stakeholder engagement should be undertaken, ensuring that the design responds to the needs and wishes of those who use or will use the environments created, and expert advice. It will also be important to establish design credibility by incorporating technical and financial details and provision for continuity of the project architect into the assessment remit given experience, particularly of third party implementation by 'design and build' firms, of value engineering and other imperatives which have diluted the design quality that has in part justified the scheme in the first place.
- 6.29 Spaces around buildings, including streets, parks, squares and so on are as important as buildings themselves in contributing to people's experience of the built environment. Safety and security considerations are paramount for local people, and can deter people from using the public realm, public transport and particular buildings, as well as affecting how comfortable they feel in their own homes and places of work, and some groups are particularly affected (see IIA). In fact, most people have a low chance of being victims of crime but the numbers of people that are afraid or worried about something happening to them are relatively high. Increasingly, anti-terrorist measures<sup>2</sup> and in some places, and in relation to some uses (e.g. large leisure venues, stations) measures to manage large volumes of people (crowd safety) will be important. As well as activation, diversion/dispersal, and surveillance provided by the arrangement of uses, provision of good lighting and sight-lines, a choice of routes in, out and across spaces, clear delineation of public and private space, and durability and maintenance are important. Embedding Secured by Design principles fits with the obligation referred to in SP1 (Section 17 of the Crime and Disorder Act 1998, duty to prevent crime and disorder). The scheme has proven results in reducing crime and the fear of crime, with up to 75% decreased chance of being burgled and a 25% reduction in criminal damage<sup>3</sup>. The scheme is also successful at reducing anti-social behaviour, through a raft of measures including robust communal door standards, access control and careful design / layout of new homes. High crime can be a

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<sup>2</sup> [Letter from the Chief Planning Officer](#) (DCLG) emphasised the important role the planning system plays in ensuring appropriate measures are in place in relation to counter-terrorist and crime prevention security.

<sup>3</sup> [Secured by Design](#) website

factor in why people move home and in the Newham context implementation of the scheme will have a role to play in reducing population churn.

- 6.30 The public realm has multiple roles, including as incidental social and play space and as such, considerations such as ease of access for all, features of interest and flexibility of use, including playability, de-cluttering and shelter will be important. Natural greenspace or views of it will also add to sustainability and health benefits. In addition, a key use of public space may be as a route between destinations, which requires public spaces and streets to provide logical, clear, pleasant, safe and interesting connections between places for use by pedestrians and cyclists with a range of abilities, encouraging these more active and sociable travel modes. This will also require the relationship of such spaces to the car to be managed, ensuring that car parking and road traffic does not dominate. For larger sites, the implication is that connected streets and spaces should be provided that allow the wider public access through and around the development.

## Implementation

- 6.31 Developers should explain and justify their response to the components of good design set out in this policy and reasoned justification within the mandatory Design and Access Statement. The submission of a Building for Life<sup>4</sup> assessment is encouraged. The London Plan Housing SPG<sup>5</sup>, and the East Thames High Density Toolkit<sup>6</sup> are valuable in structuring such statements, and guide the applicant to how the policy criteria can be met. Expert advice will be taken within the Council to support assessment of Design and Access Statements from environmental health and design officers and from the independent Design Review Panel. The Newham Character Study<sup>7</sup> should be a starting point in identifying aspects to address in scheme design. However, more detailed site based analysis will also be required including design credibility by incorporating technical and financial details and provision for continuity of the project architect into the proposal.
- 6.32 Strategic Planning and managed change in the borough is to be supported by good design emphasising strategic planning of infrastructure, destinations, bad neighbour uses and appropriate spacing and buffering for example on an area basis, led by this Local Plan and more detailed masterplans; where possible such masterplans should be accompanied by implementation plans that include consideration of the management of change, such as the provision of 'meanwhile' uses and marketing strategies/market testing in the interest of avoiding inactive voids. Public sector land-holdings offer the opportunity to present design exemplars as they come forward for redevelopment.

## Monitoring

- 6.34a The monitoring framework includes specific performance indicators relating to Quality Urban Design upon which the relevance and efficacy of Policy SP3 will be assessed. Outputs relating to Quality Urban Design in planning, regeneration and through complementary measures will be drawn from general activity reporting (e.g. Design Review

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<sup>4</sup> <http://www.builtforlifehomes.org/>

<sup>5</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/housing-supplementary>

<sup>6</sup> <https://www.east-thames.co.uk/content/high-density-toolkit>

<sup>7</sup> <https://www.newham.gov.uk/Documents/Environment%20and%20planning/NewhamCharacterStudyInterim.pdf>

Panel activity). Design outcomes are difficult to measure so outcomes are necessarily proxies monitored through corporate surveys. Ongoing informal engagement with residents and elected members also provides useful feedback on design issues and has been used for instance to inform the updated Character Study

#### 6.34b Indicators

- i. SP-OP3 Securing Quality Urban Design:
  - a. Design Panel activity [No specific target; monitor for effectiveness];
  - b. Building for Life Assessments [Majority good or excellent];
  - c. Inclusive access improvements [No specific target: monitor for indication of ongoing commitment to improvements];
- ii. SP-OP8 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];
- iii. SP-OUT1 Successful Place-making and Design:
  - a. Crime and fear of crime;
  - b. Satisfaction with the area [Maintain above 75%, should be improving].
- iv. See also infrastructure monitoring, plus SP-OP1.

## SP4 Tall Buildings

Proposals comprising tall buildings (of 6 or more storeys) that address the following strategic principles and spatial strategy, and design, management and technical criteria will be supported:

### 1. Strategic Principles

- a. Tall buildings will, through their managed location, height, design, form and impact contribute to best effect in promoting regeneration and creating successful places; and
- b. Increased densities in the right locations will generally be encouraged, however, the appropriateness, added value and positive contribution of tall elements, particularly standalone tall towers will require robust justification and demonstration in relation to successful place-making and sustainable, mixed and balanced communities principles.

### 2. Spatial Strategy

- a. Parts of Stratford Metropolitan town centre will be the key location for the tallest buildings in the borough (20 storeys plus to mark key locations on the Strategic Site-S05, but typically less) with the Canning Town 'tallest buildings area' Strategic Sites as a secondary focus, as a component of transformation plans for these centres (maps setting boundaries for Stratford 'Tall Buildings Policy Area' and Canning Town 'Tall Buildings Policy Area' are attached);
- b. Other locations on Strategic Sites within both the Arc of Opportunity and Urban Newham are regarded as suitable locations in principle for tall buildings with scale reflecting place hierarchy, ensuring sufficient space between clusters, as indicated in site allocations; and
- c. Elsewhere, new tall buildings will generally be inappropriate and opportunities to increase densities without tall buildings should be explored, with sensitively scaled tall buildings the exception rather than the norm and only where there is good public transport access of at least a PTAL score of 4 and the opportunity to create generous public realm.

### 3. Design, Management and Technical Criteria

- a. Notwithstanding the above, in all cases the need for additional work, including the use of wire frames and 3D modelling to refine suitable locations and formations within this spatial framework with particular regard to the degree of public transport accessibility, local height context, heritage and other character assets and their settings and other sensitivities including cumulative impacts, in line with Policies SP1, SP3, SP5 and SP9, drawing on the Newham Character Study; and
- b. In all cases the expectation that all tall buildings schemes will through masterplanning, detailed designs, modelling and expert and independent design scrutiny demonstrate appropriateness, added value and positive contributions relative to lower-rise alternatives, and exemplary design, execution and management standards (as per Policy SP3, SP5, and SP8) having regard to the initial screening and scoping reflected in Strategic

Site allocation indicative height specifications, in respect of the following:

- i. Scale;
- ii. Form and massing, including cluster formation/extension, spacing and a balanced range of heights including mid-rise and low-rise elements where appropriate;
- iii. Proportion and silhouette;
- iv. Facing materials and detailed surface design;
- v. Integration with local and historic context;
- vi. Impact on streetscape including surrounding public realm and near views and Key Corridor objectives as per INF7;
- vii. Impact on cityscape, distant views and skyline;
- viii. Microclimate including daylight/sunlight, wind, and pollution dispersal impacts;
- ix. Contribution to legibility, successful place-making and sustainable, mixed and balanced communities principles;
- x. Management of communal spaces, inside and outside the building;
- xi. Credibility of design from a technical and financial perspective including continuity of the project architect;
- xii. Safety, including fire prevention and safe evacuation; and
- xiii. Impact on ecology and amenity of a watercourse.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Spatial Strategy.

### Justification

- 6.36 Tall buildings are defined in the London Plan as those that are noticeably taller than their immediate surroundings, and/or have a significant impact on the skyline. Tall buildings in Newham can therefore mean anything up to and beyond 25 storeys – buildings of this height are to be found in Stratford and Canning Town town centre. Elsewhere, in much of established Urban Newham, 5 storeys may be considered tall, though in most cases in the Arc of Opportunity 8-12 storeys would be the typical established height in newer development. To ensure the application of this policy to all tall building proposals in Newham, however, a tall building is considered to be six or more storeys and all proposals containing buildings of this height should be assessed against it.



Figure 3.1 - Policy SP4: Stratford Tall Buildings Area

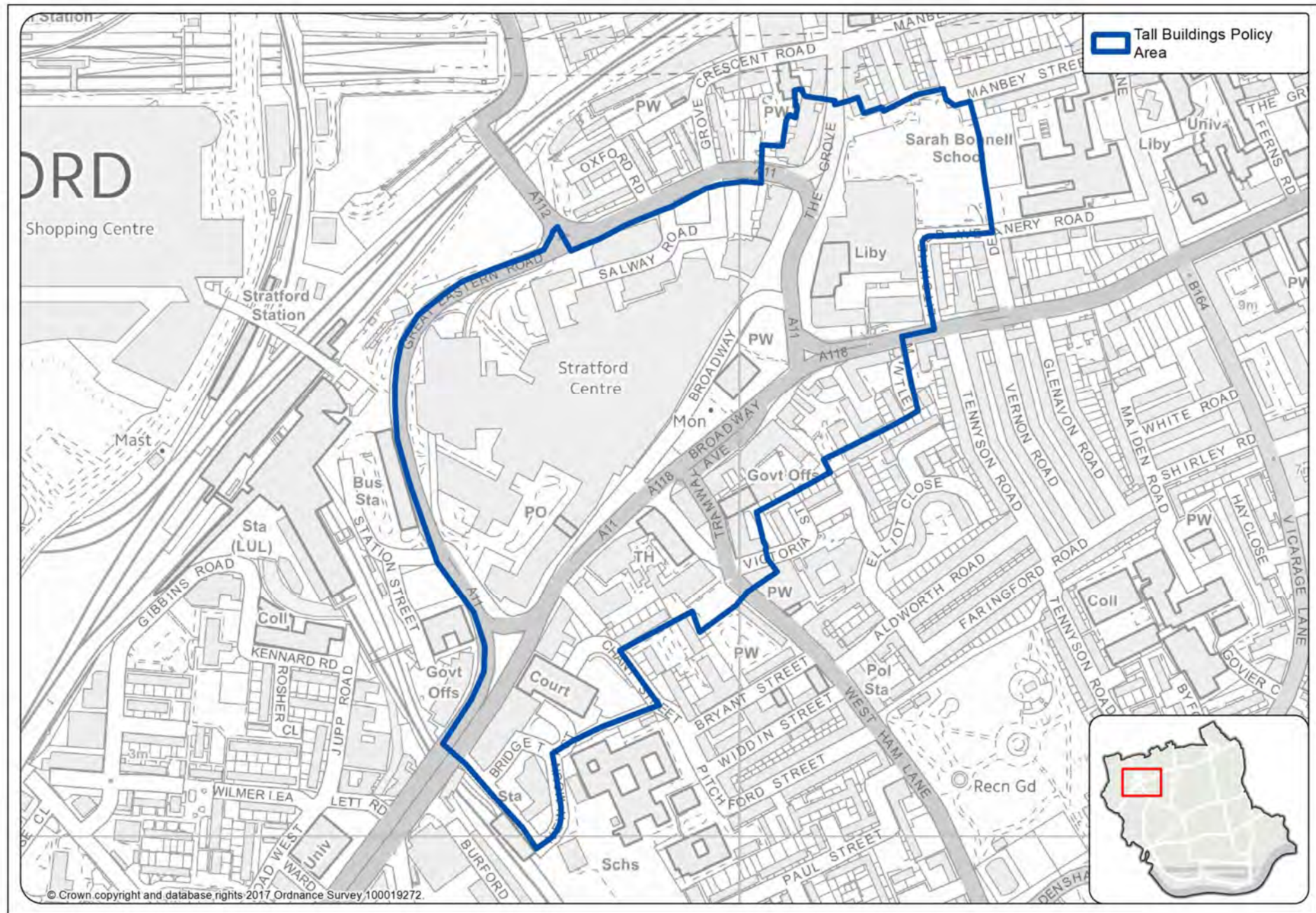
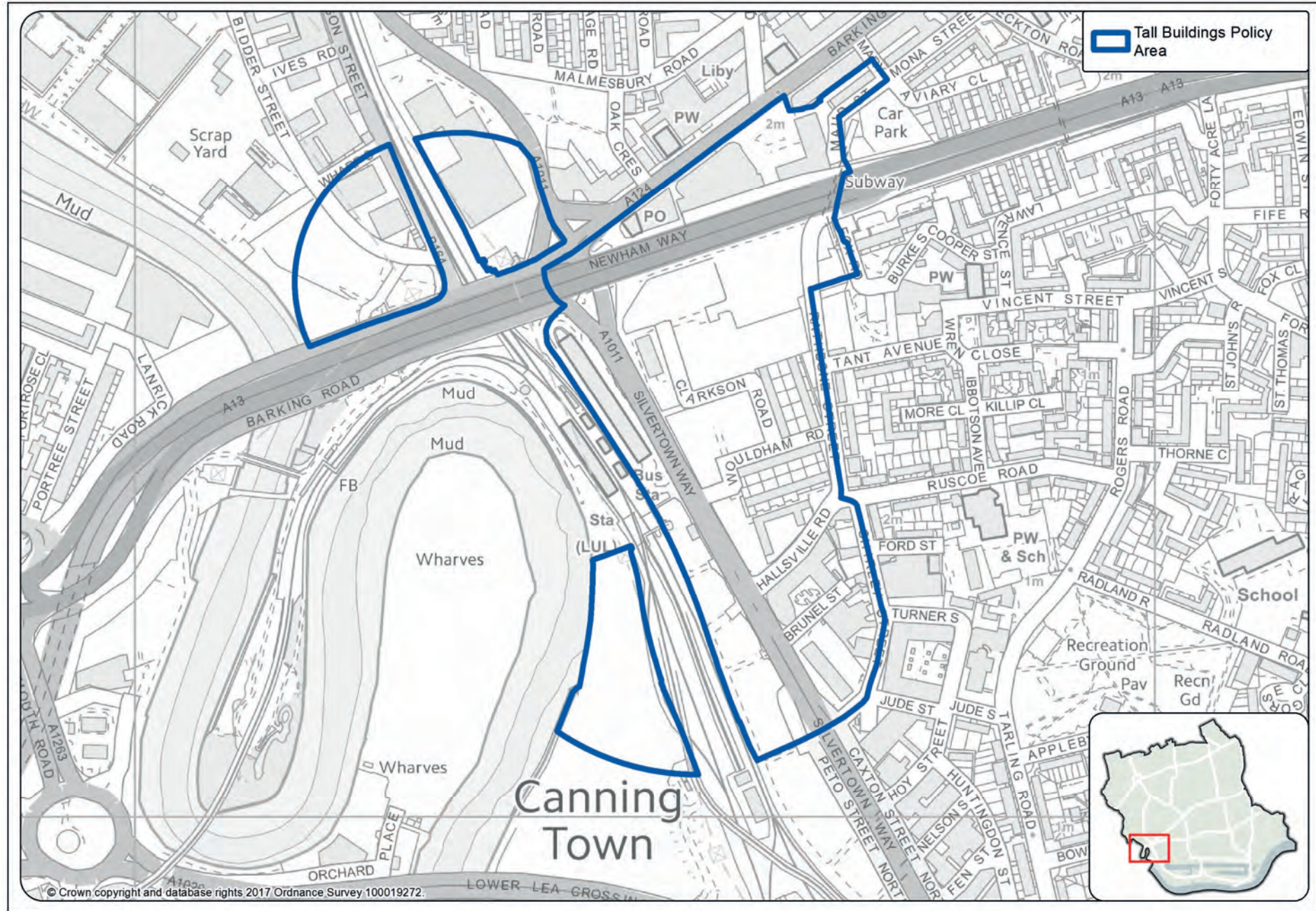




Figure 3.1 - Policy SP4: Canning Town Tall Buildings Areas



- 6.37a There are many positive aspects to tall buildings which make them an attractive development from several perspectives. Tall buildings can help create and distinguish high quality place-making which is one of the over-arching objectives of the Local Plan: they can be excellent works of architecture, and some of the best post-war examples are now statutorily listed. The introduction of a prominent visual feature into an existing townscape can change its character and appearance and present a better perceived 'offer' for the area to the rest of the borough and London: Tall buildings can thus be iconic buildings that define a strong sense of regeneration, economic vitality and status of place, creating new views and landmarks and helping to improve legibility by marking for instance, town centres and transport hubs.
- 6.37b Tall buildings also offer the opportunity to build to higher densities around public transport nodes/key routes and in town centres, helping to support their viability and vitality. They may accommodate significant numbers of new homes, and cross subsidise affordable housing, and employment-generating uses/community facilities in an intensely used and vibrant development that activates the surrounding area and makes new infrastructure viable. A tall building can offer flexibility between office, hotel and residential and other appropriate uses. They can also help secure the redevelopment of small sites with high land values, or sites which need to 'give' land to open space, view or route corridors or buffer industrial uses, roads and rail infrastructure. This form of development therefore can help promote mixed use areas and mixed communities and aids growth, optimising development potential in light of local and strategic needs.
- 6.37c Conversely, a poorly designed tall building may create an isolated mono-community with little social interaction within the building and with the wider community in the area. The economics of building a taller building with its higher service charges may not necessarily optimise the housing opportunities available to residents in the borough. There may also be problems of 'ownership' and intensity of use of communal areas if not designed in such as way as to secure communal responsibility and ensure durability.
- 6.37d A principal failing with tall buildings can be a lack of understanding of the nature of the area around them, and failure to demonstrate neighbourliness (see SP8). Issues of local wind flow disruption, temperature reductions at pedestrian level around tall buildings, over-shadowing and street pollution flushing effects will have implications for the amenity of those living or working in or around the buildings. Perhaps most importantly, a tall building if not in the right place and if not well designed including treatment of the surrounding public realm, will by virtue of its size and widespread visibility, seriously harm the qualities that people value about a place, disrupting rather than enhancing place character.
- 6.37e Importantly however, many of these benefits can be achieved in buildings that are 'taller' by just a few storeys than the prevailing height locally, but not necessarily 'tall' in the increasingly common sense of the word – 18-20 storeys plus. In addition, mid-rise development has less impact on surrounding dwellings, less overshadowing, and offers more opportunities for social interaction. As such, it is worthwhile to consider alternative ways of providing high density development, given that 2 to 4 storey combinations of mews housing and flats and maisonettes can yield densities of up to 120 dwellings per hectare. This is particularly relevant in relation to the qualitative criteria specified, notably sustainable community objectives described in more detail in the Homes Section, where



housing mix and choice including a greater proportion of family housing, and overall high quality housing with appropriate amenity space, are prominent themes. This is significant because research has shown that tall buildings with high child densities, but also conversely, where social housing forms a significant proportion of units, are more intensively used, and hence unless very carefully designed and managed, potentially less successful. Another consideration is that service charges in tall buildings, when not capitalised, can reduce affordability, particularly for shared ownership units. The emphasis in the local plan on mid-rise development as the preferred form for tall buildings in the borough is based on these considerations, requiring specific demonstration of their added value.

- 6.37f The design and management specifications for tall buildings are high, reflecting the particular effort needed to overcome the disadvantages of tall buildings and their potential negative impacts locally, to ensure their strengths are more prominent. Moreover, good practice has established that family housing is best focused on the first four storeys of a block, enabling easiest access to the block and open space. This specification extends to the procurement process – designs must be credible, technically and financially, as design excellence is easily disrupted by the standard of execution. Amenity, communal and circulation space, the ground level environment created, the design of the top of the building, public access and site permeability, sustainability, and the relationship with transport infrastructure will need particularly careful treatment. Likewise, it is essential to ensure that evacuation times are as speedy as possible, to improve fire resistance, and to ensure that future changes and alterations do not have an adverse affect on safety.
- 6.38 The current situation in Newham is that the increasing pressures of recent years for tall buildings have been guided to appropriate locations by Policy SP4. Although there have been some cases where buildings have been constructed at greater heights than would have been indicated by the policy, these approvals were justified by criteria also referred to by the policy: tall buildings already present in the locality setting a local character which accommodated the height of the proposal; proximity to public transport nodes; and design excellence as certified by the Design Review Panel.
- 6.38a This policy therefore continues to advance a strategic, plan-led approach to the placing of tall buildings in the urban context, as required by national and London-wide policy. Spatially, this is based on an analysis of sensitivity and capacity, including the overall spatial vision for the borough, and an understanding of the strengths and weaknesses of tall buildings including those already in place. To this end, Stratford Metropolitan and Canning Town town centres are highlighted as priority locations, given the transformations of borough-wide significance that are taking place in these centres, and the resultant importance of them as well as their associated transport hubs.
- 6.38b The Local Plan emphasises the management of the borough's town and local centres and their hinterlands as part of a clearly defined place hierarchy within the borough, encouraging consolidation of town centre uses, and by extension, other intensive uses of space, within their boundaries. The town centres are characterised by high PTAL ratings and ready availability of services making them appropriate locations for high density development. Tall buildings have the potential to deliver quality place-making with associated socio-economic benefits by providing buildings of high architectural quality as well as improvements to the public realm. The spatial benefits of guiding tall buildings to

town centres include enhancement of the centre's vitality and viability. Local centres in turn are also important locations within a neighbourhood which may justify a proportionate marker in height terms, cognisant of local character as per SP3 and the relevant spatial policy.

- 6.38c In line with this policy approach to a hierarchy of places in the borough Stratford Metropolitan and Canning Town Town Centre are therefore distinguished by their being the areas in the borough where new tall buildings over 20 storeys should be focused, supported by additional tall buildings of lesser height. The particular formations of these centres should be clearly related to the place-making transformation plans for these centres articulated in spatial policies and site allocations, and subject to the further tests set out in this policy, and the wider design policies of SP1, SP3, SP5, SP7 and SP8. The remaining town centres may also be appropriate for tall buildings as identified by the Strategic Sites allocations, but these will be overall less significant in number and in height than those in Stratford and Canning Town.
- 6.39 In the remainder of the Arc, particularly south of Canning Town Town Centre there is capacity for tall buildings due to the large development sites which can absorb carefully planned innovative schemes, though the Airport's safeguarding Area compulsorily restrains development heights over much of the area. However, tall buildings need to be deployed strategically, in relation to locations that are immediately accessible by high volume public transport links (DLR, Crossrail, tube) and to help mark the centres or other foci of new places, which will typically be around such stations. However similarly, such buildings will be overall of lower height and fewer in number than those in Stratford and Canning Town town centres, and proportionate to the place's importance.
- 6.39a It is also important that significant views within the borough are protected. Although the lie of the land in Newham is flat and very gently rises from the river there are nevertheless views through to the rivers Thames, Lea and Roding and parks from public open space including Key Corridors which are worthy of protection. The importance of maintenance of a coherent and legible skyline is therefore an important consideration in the appropriate location of tall buildings.
- 6.39b Each of these Strategic Sites is therefore accorded an indicative height and other formational specifications. In arriving at these indications, other existing tall buildings and concurrent proposals for tall buildings at adjoining and nearby sites with particular reference to impacts arising from creation of a cluster of tall buildings or an addition to an existing cluster have been taken into consideration. A similar approach is taken to the Strategic Sites in Urban Newham where there will be more limited opportunity for tall buildings given the more tightly woven, lower rise existing urban grain and heritage assets, which will need to be reflected in their scale. As in the Arc of Opportunity, strategic sites appropriate for tall buildings are allocated in Urban Newham with an indication of an acceptable height for each site.
- 6.39c This approach delivers a scale of individual sites and clusters of sites which allow for appropriate master planning and the specific siting and formation of tall buildings and/or other forms of higher density development to best effect. Ensuring that scale is appropriate as part of place-making means sensitivity to local and historic context and character as per Policies SP1, SP3, and SP5, but also the degree of public transport

accessibility, place hierarchy (distinguishing between town and local centres and their hinterlands, and reflecting the town centre hierarchy set out in INF5), and enclosure and integration objectives for Key Corridors and linear gateways. This also means ensuring that these clusters and locations remain distinct, rather than joined by long lines of tall buildings. In this regard, an emphasis on stepping down and transition in scale are important to establish satisfactory relations with surrounding development, and in some cases stepping back (above a certain height may help in more low rise areas/smaller sites) will also be important.

- 6.40 Elsewhere in the borough outside the Strategic Sites there will be limited opportunities for the development of tall buildings. A minimum PTAL level 4 is expected at tall building developments outside the allocated Strategic Sites, and scope to create generous public realm. This again will usually imply location adjacent to key transport nodes, (bus stations, train and underground stations) and sites size and location that affords significant public realm opportunities. Along key corridors however, (see Policy SP7) marginal increases in height (by 1 or 2 storeys) may nonetheless be acceptable to help improve enclosure and integration of existing buildings and public realm, with scope for possible mid-rise developments in town centres and adjacent key transport nodes.
- 6.41 Additional, more detailed work concerning location and formation within this spatial framework will be necessary to ensure such buildings contribute positively as envisaged. The policy establishes new strategic parameters as the basis for such refinement work in different parts of the borough, drawing extensively on Historic England's Tall Buildings guidance.

## Implementation

- 6.44a A typical storey height being 3.1m although ground floor heights may desirably exceed this at 4.65 metres. A tall building in the context of Newham is therefore an excess of 17.05 metres. This policy will therefore apply across the borough where schemes exceed 5 storeys or less if they nonetheless exceed this height.
- 6.44b This approach emphasises that just because one or two buildings in the vicinity of a site are taller than the prevailing building height locally, this does not mean that further tall buildings will be acceptable. In particular, the local authority tower blocks that were erected as part of a national housing program in the 1960s and 70s without reference to spatial planning or local character and which dominate some parts of the borough should be discounted as precedents.
- 6.44c The indicative heights as part of Strategic Site allocations help clarify the application and expectations of the policy, presenting an initial screening and scoping. More detail on height contexts benchmark numbers of storeys is available in the Community Neighbourhood Forum analysis of the Character Study.
- 6.44d At the planning application level which it is expected will have been preceded by an extensive pre-application process including supervision by the Design Review Panel, proposals will be expected to fulfil the following requirements as a minimum, typically requiring detailed designs, accurate and realistic representations of the proposal including 3D modelling of the scheme as a whole and its surroundings, and for all tall buildings:

1. Alternative ways of providing high density development (including various height mixes) in this location and the specific added value that the tall building(s) bring to the scheme in comparison.
2. Justification of any deviation from site allocation height indications, given that these have been based on an initial screening of constraints and acceptability in the area, with specific reference to:
  - i. the character of surrounding areas and the settings of heritage assets;
  - ii. impact on significant views;
  - iii. impact on townscape and public realm including open spaces and blue ribbon infrastructure;
  - iv. cumulative impacts of tall buildings;
3. Consideration of impact on microclimate and local environment;
4. Consideration of distribution of block and unit sizes, and tenures, particularly 3 bed units, and management, including fire safety and evacuation measures and affordability of service charges.

6.45 Specialist advice available from the Council, Historic England and Design Council CABE will assist in the consideration of tall building proposals. Building for Life 12 criteria and/or positive reviews from the independent Design Review Panel may be used to evaluate design excellence. Historic England note no. 4 'Tall Buildings' will be a material consideration.

6.45a Airport considerations Development proposals above specified heights within set distances of the airport and all development immediately adjacent to it will require referral to the Civil Aviation Authority for scrutiny of flight path, visibility and safety implications. These compulsory aerodrome safeguarding measures will of themselves restrain building height over a substantial area.

6.45b Where reference is made to successful-place making and sustainable communities objectives, further detail are set out in other SP policies, H1-3 and spatial policies. Place-hierarchy, distinguishing between town and local centres and their hinterlands is further elaborated in SP6 and INF5.

6.46 Site assembly - given that tall buildings are best planned and designed on larger sites which gives maximum flexibility to their formation, and alternative forms of high density development can also be more easily achieved on larger sites, site assembly is central to securing the qualitative aims of this policy, which public bodies can facilitate.

6.46a Careful master-planning of a Strategic Site will enable the location of the tallest buildings in any scheme to be placed at key locations. Such key locations may be identified at transport nodes and/or local/town centres effecting a place hierarchy within the site itself. Alternatively, they may relate to the topography and characteristics of the site, and visual design approach e.g. at focal points for vistas. Justification for a tall building at a particular location within a Strategic Site will be required to meet the design, management and

technical criteria set out this policy with reference to the interior of the Strategic Site as well as the wider area, and the meaning of the term 'key' should not be stretched so as to dilute it by applying it to too many locations.

- 6.46b This has already occurred in the area as part of the master-planning and almost complete development of the ExCeL estate, with its high density form establishing a new development context that marks its status as an important employment hub, (see Policy J1) and block heights generally increasing around stations; this policy allows for its completion as a planned tall buildings cluster in a carefully managed way.
- 6.47 Redevelopment of older tower blocks, or where close to Strategic Sites, their appropriate integration into tall building compositions, should be proactively considered as part of housing improvement schemes where practicable, to secure more appropriate housing formations, and improve local character.

## Monitoring

- 6.47a The monitoring framework includes specific performance indicators relating to Tall Buildings upon which the relevance and efficacy of Policy SP4 will be assessed, through in-house activity monitoring and GIS analysis. Tall building approvals will be monitored on an annual basis in the Planning Register. Outcome measures will reflect broader successful place-making and good growth. Engagement with residents and elected members will also be an important feedback mechanism.

### 6.47b Indicators

- i. SP-OP4 Strategic direction of tall buildings:
  - a. Location of tall building approvals [no specific target, monitor for conformity with spatial strategy];
  - b. Tall buildings approved without detailed designs [no specific target, should be decreasing];
- ii. SP-OP8 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];
- iii. SP-OUT1 Successful Place-making and Design:
  - a. Satisfaction with the area [Maintain above 75%, should be improving].

## SP5 Heritage and other Successful Place-making Assets

Proposals which address the following strategic principles and spatial strategy and design and technical criteria in their concept, design and implementation will be supported:

### 1. Strategic principles and spatial strategy

- a. The value of heritage and other assets (natural, cultural, architectural, and infrastructural) which contribute to local character and successful places will be recognised by protection, conservation, and enhancement of the assets and their settings, and where appropriate, cultivation of new ones;
- b. Urban design should recognise the strengths and weaknesses of local character and seek to contribute positively to the composition of the townscape, achieving better integration and enhancement of new and old, natural and built environments, infrastructure and living environments;
- c. Designated and non-designated heritage assets will be conserved and enhanced, with any change to them based on an understanding of the nature of their significance and the contribution of their settings to that significance, seeking to increase their presence and encourage wider appreciation, ownership of, and access to them;
- d. Innovation will be encouraged to realise the value of assets and secure viable, sustainable and appropriate futures for them, particularly where they are under-performing/At Risk, reconciling this with the sensitivity to change presented by many (see also Policies SC2, SC4, INF6 and INF7);
- e. In addition to heritage assets designated under other regimes, (listed buildings, conservation areas, Scheduled Monuments, Historic Parks and Gardens which are mapped below) the locations listed in Tables A and B below are designated as Areas of Townscape Value and Archaeological Priority Areas.

### 2. Design and technical criteria

- a. Proposals should refer to and draw on the borough's Character Study which includes Areas of Townscape Value, and where relevant, Conservation Area Appraisals and Archaeological Priority Areas to help identify heritage and other assets relevant to their scheme, and strengths and weaknesses of local character; and
- b. The relevant consultation and investigation expectations that accompany an APA designation (set out by GLASS) should be complied with.

**Table SP.B Areas of Townscape Value**

ID	Area Name
ATV1	Wanstead Flats
ATV2	Sebert Road
ATV3	Manor Park
ATV4	Forest Gate
ATV5	All Saints Church, Church Street North*
ATV6	Cheltenham Gardens, Henniker Gardens, Ranccliffe Road
ATV7	Canning Town
ATV8	Winsor Terrace*
ATV9	Bargehouse Road / Woolwich Manor Way*

*\* Note that ATV5, ATV8, ATV9 and the area surrounding West Ham Park may be taken forward as Conservation Areas within the plan period.*

**Table SP.C Archaeological Priority Areas**

Archaeological Priority Area ID	Area Name
<b>Tier 1</b>	
APA1.1	Beckton WW2 Gun Emplacement
APA 1.2	Fort Street
APA 1.3	Prince Regent Lane
APA 1.4	Stratford Langthorne Abbey
APA 1.5	Woolwich Manor Way
<b>Tier 2</b>	
APA 2.1	East Ham
APA 2.2	Green Street 18.51
APA 2.3	Little Ilford
APA 2.4	Plaistow
APA 2.5	Plashet
APA 2.6	Stratford
APA 2.7	Upton
APA 2.8	Wall End
APA 2.9	West Ham
APA 2.10	Beckton Sewage Works
APA 2.11	Ilford Gaol
APA 2.12	Stratford Railworks
APA 2.13	Thames Ironworks
APA 2.14	London to Colchester Roman Road
APA 2.15	Manor Park to North Woolwich Roman Road
APA 2.16	Newham Cemeteries
<b>Tier 3</b>	
APA 3.1	River Lea
APA 3.2	River Roding
APA 3.3	Royal Docks

APA 3.4	Canning Town/Newham Way
APA 3.5	Beckton
APA 3.6	Wanstead Flats
Tier 4	
APA 4.1	Rest of the borough

Table SP.D Conservation Areas

Durham Road Conservation Area
Woodgrange Estate Conservation Area
Three Mills Conservation Area
Romford Road Conservation Area
Forest Gate Town Centre Conservation Area
Stratford St Johns Conservation Area
University Conservation Area
East Ham Conservation Area
Sugar House Lane Conservation Area

Further information on Historic Assets is available on the Council website:

Historic Buildings - <https://www.newham.gov.uk/Pages/Services/Listed-buildings.aspx>

Conservation Areas - <https://www.newham.gov.uk/Pages/Services/Conservation-areas.aspx>

Ancient Monuments - <https://www.newham.gov.uk/Pages/Services/Historic-sites-and-monuments.aspx>

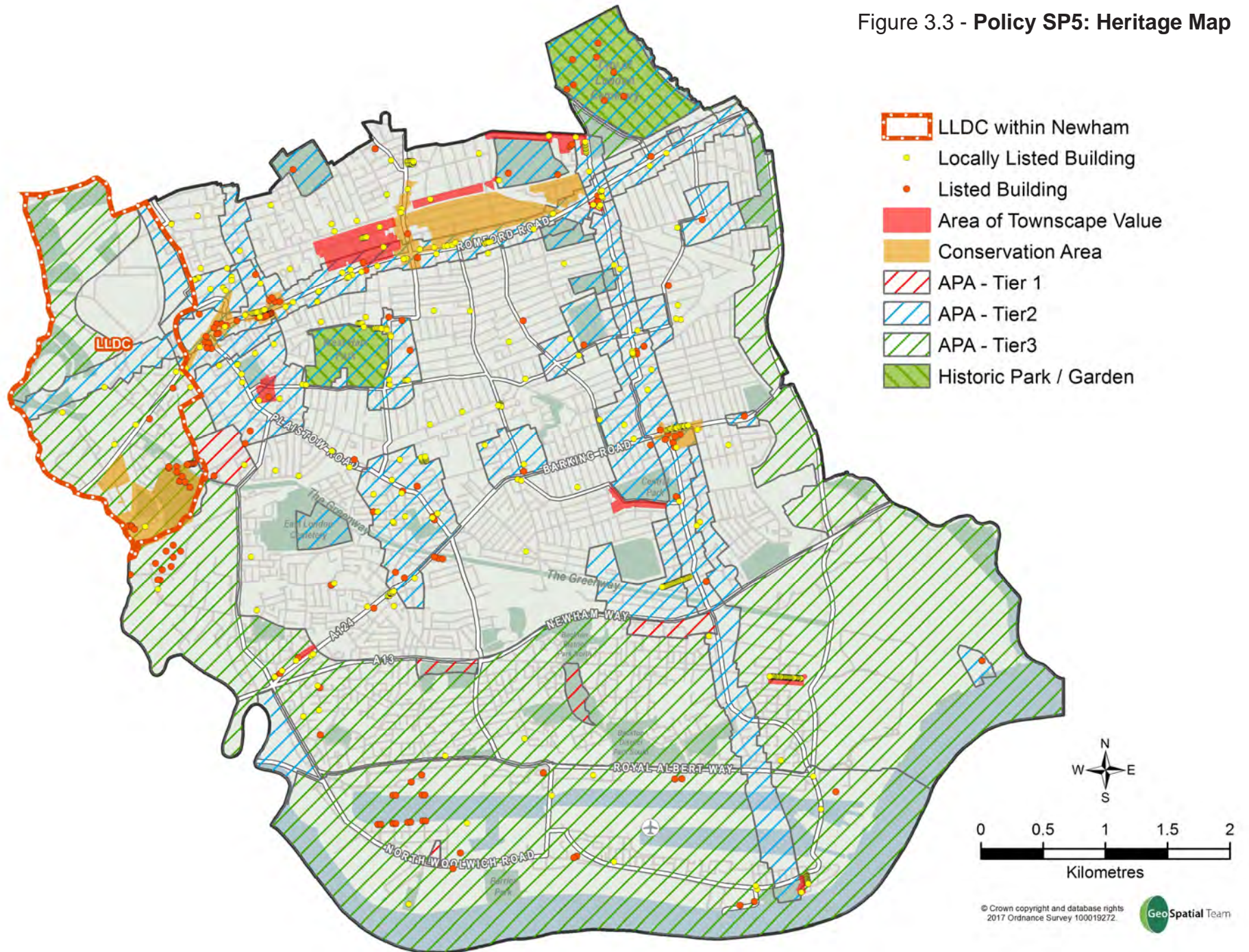
For the purpose of Neighbourhood Planning, the following sections and sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles and Spatial Strategy.

## Justification

6.49 In seeking to create distinctive and successful places as one of the overarching objectives of the local plan, it is vital that existing assets are recognised in design so that their full potential can be realised in line with national and London-wide policies. These assets also have a role to play in achieving the other objectives of the Local Plan of delivering growth and optimising development. Starting with heritage, until recently traditionally this has to some extent been overlooked in Newham both by statutory agencies such as Historic England, and others responsible for change in the borough, from home owners through to large-scale developers. This is partly due to Newham's relatively recent development when compared to some areas which means heritage assets have been seen as less significant than older ones elsewhere, and partly the inevitable result of incremental changes (with limited character-based direction) which add up to more significant ones. As such, Newham currently has relatively few Conservation Areas and listed buildings despite having a range of identifiable heritage features including many fine examples of Victorian and Edwardian buildings, docks and waterways. It also means that through neglect, distinctiveness has been eroded and the physical condition of some assets has



Figure 3.3 - Policy SP5: Heritage Map



deteriorated: this is reflected in the fact that the borough contains a variety of heritage assets on the 'Heritage At Risk' register<sup>1</sup>, for example 11% of listed buildings and monuments were considered to be 'At Risk' in 2017. These considerations emphasise the need for re-valuation of the borough's heritage assets.

- 6.50 Therefore in turn, the importance of attending to (protecting, conserving and enhancing, and thereby re-valuing) both designated heritage assets and those more informally recognised, together with their setting, is indicated. The former includes those buildings, monuments, structures, parks, etc., that are subject to national listing/ scheduling, those areas designated as Conservation Areas; the latter includes Areas of Townscape Value, (recognised for their special architectural and historic character) Archaeological Priority Areas (identified as per Historic England Advice for their potential archaeological interest) and locally listed buildings.
- 6.51 Their value includes adding interest and legibility, (as landmarks) to an area; the contribution to community building as a focus for community memory and activity; the contribution to sustainability by embodying energy if they continue in use; and harder economic value as visitor attractions either individually or as part of a place for spending time and money in, perhaps as part of a wider cultural economy strategy, or in the case of waterways, as transport routes. In turn they can be seen as important to create neighbourhoods which are desirable to invest and stay in, hence the need to address their presence and encourage wider ownership of and access to them. It should be noted that archaeological projects have a well-established history of enabling successful community engagement.
- 6.52 A more holistic approach to heritage in place-making is logically extended to other character assets, whether natural (including trees and woodland), cultural (e.g. meeting places and places of social display and other cultural activity including 'back of house' activities such as set and costume design which support other uses), architectural or infrastructural (e.g. stations) as part of the transformation plans for the borough (see Policies SP1 and SP3 and J1). These are indicated in relevant spatial policies and more extensively but not exhaustively in the Newham Character Study (2017). This approach recognises that all these asset types have in common sensitivity to change that directly or indirectly affects them and those that benefit from them including the difficulty presented by competition with uses able to pay higher values for land. Moreover, many such assets are underperforming in one way or another, often due to a lack of integration with the wider environment including other assets, so that their settings detract from them, they are underused or create a barrier effect. This highlights the importance of composition - ensuring coherent and sensitive ensembles of assets and their settings, as well as innovation and change both from the present situation and to address evolving circumstances, including climate change. Innovation includes appropriate deployment of 'meanwhile' uses and other suitable measures to activate spaces and structures to help bring them back into people's day-to-day experience of places, improving security, resilience to climate change and energy efficiency and enabling immediate community benefit. However, any such change needs to be based on an understanding of the sensitivity to change of the asset in question, ensuring it is appropriately valued and accommodated in order to avoid causing harm to its significance. It is also recognised, that

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<sup>1</sup> <https://historicengland.org.uk/advice/heritage-at-risk/>



in new places, or places needing to find new purposes and economic and social futures, creating new assets, for example through arts and culture led regeneration will be beneficial.

## Implementation

- 6.53 Developers will be expected to respond to the various aspects of this policy as appropriate in their Design and Access Statements having analysed the context to their development with reference to the borough's Character Study which includes information about Areas of Townscape Value, and where relevant, Conservation Area Appraisals and Archaeological Priority Areas. This should result in incremental change, including resources to support heritage conservation and enhancement, helping to reduce the number of assets identified as Heritage at Risk.
- 6.53a Development proposals involving heritage assets will re-value them by taking advantage of design cues in the Newham Character Study which take forward objectives of sustainability; viability of initial investment as well as future use and management; public access, visibility (contributing to legibility) and enjoyment; spreading the regeneration value of heritage assets; and retaining the integrity of heritage assets and their settings.
- 6.54 The Council will continue its programme of Conservation Area appraisal and with its partners including Historic England and local heritage groups, investigate the scope of further identifying, protecting and enhancing heritage assets (e.g. through designating new Conservation Areas, identifying opportunities for reuse and where appropriate, modification of heritage assets to improve energy efficiency). Trees and woodland which contribute the amenity of particular parts of the borough will be identified and protected by tree preservation orders (see INF6).
- 6.54a In relation to archaeological remains, where excavation is unavoidable, the expectation will be that appropriate recording, analysis and dissemination of findings is undertaken.
- 6.55 Further guidance and advice is to be found in the guidance referenced (and updates as appropriate), and from Historic England, GLASS Design Council CABE and the Council's Design Manager.
- 6.56 Master-planning and stakeholder engagement will assist in identifying more assets, and strategies to conserve and enhance them as part of wider area-based change.

## Monitoring

- 6.56a The monitoring framework includes specific performance indicators relating to Heritage and other Place-making Assets upon which the relevance and efficacy of Policy SP5 will be assessed. Outputs can be measured by scrutinising performance in respect of statutory requirements for the protection of listed buildings, tree preservation orders and conservation areas. Outcomes will be apparent from informal engagement with residents (including through independent surveys regarding satisfaction with the area) and elected members and feedback from bodies such as Historic England.
- 6.56b Indicators

- i. SP-OUT1 Successful Place-making and Design:
  - a. Satisfaction with the area [Maintain above 75%, should be improving];
- ii. SP-OP5 Re-valuing heritage and other place-making assets:
  - a. Conservation area appraisals and Management Plans in place [Full coverage];
  - b. Conservation and heritage studies completed as part of masterplanning/strategic site development where applicable [no specific target];
  - c. Loss of trees subject to a tree protection order [No specific target monitor trend to ensure reasonable protection is being afforded];
- iii. SP-OP8 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];
- iv. SP-OUT3 Heritage Protection - Monitor Buildings at Risk yearly register [Entries for Newham should decline annually].

## SP6 Successful Town and Local Centres

Proposals that address the following strategic principles, spatial strategy and design and management criteria will be supported:

### 1. Strategic principles

- a. Town and Local Centres should be vibrant, vital and valued as components of local neighbourhoods and the borough as a whole, being successful in social and economic terms; and
- b. Town and local centres should act as community foci, showcases, employment hubs and as destinations through their particular character, offer and connectivity to their hinterlands.

### 2. Spatial Strategy

- a. Ensuring routes to and from local areas and local transport nodes and across the centre are convenient, attractive and feel safe, creating them or enhancing them where necessary;
- b. The importance of a high quality, accessible public realm and a series of features and public spaces that complement the centre's commercial offer;
- c. Diversifying uses, encouraging the location of services and flexible community spaces, 'meanwhile' uses, quality night-time economy, visitor and cultural attractions and facilities, and the creation of residential dwellings in such centres as appropriate to their size and function, to add to their activity levels;
- d. Maintaining a robust retail core whilst ensuring a variety of unit sizes, and in larger centres, markets to provide choice and meet local needs;
- e. Preventing non-retail uses (particularly hot food takeaways) from clustering excessively or reaching disproportionate levels within the centre and at or adjacent to (outside the boundaries) its gateways; and
- f. Managing the centres as part of a clearly defined network and hierarchy (in line with Policy INF5), encouraging consolidation of commercial uses within their boundaries, and responding to the visions for individual centres as set out in Spatial Policies S1-6.

### 3. Design and management criteria

- a. Ensuring new developments are designed to respond to strengths and weaknesses of local character and are scaled and otherwise designed to achieve integration and coherence with the better aspects of the centre contributing to distinctive identities in line with Policies SP1, SP3 and SP5; and
- b. Attending to the particular crime, anti-social behaviour and community safety concerns brought about by congregations of large numbers of people and the evening economy.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles.

## Justification

- 6.58 Town and Local Centres are very important components of people's neighbourhoods, with the commonly articulated expectation that they should be pleasant environments to linger and socialise in or pass through, as well as functional from a daily, weekly and night time needs perspective, enabling a variety of needs to be met in one convenient trip. This policy therefore concerns existing and future Town and Local Centres as components of successful places in accordance with the overarching objectives of the Local Plan to create high quality places and successful communities and to optimise development. The need, particularly in the case of Town Centres, to be successful as economic places or destinations in their own right promotes the other overarching objective of delivering growth, as measured by the degree of activation or vitality as well as commercial spending and competitiveness (viability) in line with national and London-wide policy. Whilst there will be differing expectations in terms of the scale of town (and likewise, District, Major and Metropolitan) as compared to Local Centres, over-arching ingredients of place quality for centres are applicable whatever the scale and function. This is related to, but distinct from the technical and functional management of Town Centres and retail provision as part of a network and hierarchy, which is dealt with under the infrastructure section.
- 6.59 Evaluating the quality of place on offer in the borough's Town and Local Centres at present, using standard 'health check' methodologies<sup>1</sup>, the results of consumer surveys and other engagement, as well as character analysis, identifies a number of weaknesses that need attention to make Town and Local Centres more attractive and pleasant. These have been combined with those aspects recognised as important by good practice guidance, whilst cross-referring to specific visions for centres where most change is needed and expected in the spatial policies.
- 6.60 Working from the outside in, or from people's homes to their local and Town Centres, of key importance firstly is ensuring people can easily and enjoyably reach the centre from the local area, and that the point of arrival and public realm around the shops and services is convenient, attractive, easy to navigate around, accessible whatever a person's ability, interesting in its own right, and safe. This includes ensuring that larger commercial uses do not create blank, inactive frontages, or over-large blocks which disrupt direct routes – indeed in many cases new development brings the opportunity to address past mistakes of this type. Research has found that well-conceived improvements to public spaces within Town Centres can increase expenditure in a centre by 40%, as well as generating further private investment. In addition to standard design security features such as natural surveillance, also important will be the management of specific town centre characteristics: crowding (including the prospect of terrorist targeting) and aspects of the night time economy such as the implications of alcohol consumption on behaviour and noise. As per INF5, publicly accessible toilet provision will also be relevant to improving town and local centre accessibility and inclusiveness of their offer.

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<sup>1</sup> Notably the [London Town Centre Health Check \(2014\)](#) and [Newham Town Centre and Retail Study \(2016\)](#)

- 6.61 The mix of uses within a centre is the next layer of place to consider. Here, a robust - both substantial and flexible – retail core is important, with a variety of retail formats, particularly in larger centres, to incorporate a range of convenience and comparison, independent and multiple, large and small businesses. These bring valued diversity that can add to local identity, whilst also allowing for changes to market circumstances over time. However, retail uses alone do not provide for sufficient activation and usage to create fully vital and viable Town Centres in today's market, hence the importance of diversification both vertically above shops (mainly in the case of residential) and across the centre. This should draw in new customers who may undertake linked trips, extend activity into the evening, and generally encourage people to spend longer in a centre as more of their needs are met in one place. In larger centres, provision for tourists and visitors from beyond the local area will also be important, including both visitor attractions (e.g. street markets) and facilities (e.g. toilets). The importance of quality leisure and cultural uses such as restaurants, bars, clubs, music venues and other performance space that contribute to the night time economy is particularly recognised. The proximity of the borough to Central London, and general appetite from local residents offers opportunities for development of a local night life in the borough's centres as part of the capital's cultural offer. The -London Plan SPG 'Culture and the night time economy' notes that Stratford is one 70 night time clusters across the city yet the borough has six town centres all of which could generate their own night time identity appropriate to their role and function.
- 6.61a However, learning from past mistakes, clusters or overall numbers of non-retail uses should not be permitted to dominate a centre or its gateways, (in and outside its boundaries) detracting from its image. Particular problems are currently reported with the clustering of A5 and betting shops in and just outside the borough's centres, though any non-retail use could have a similar impact in aggregate or where they take up large proportions of frontage (see SP9).
- 6.62 The next layer is the coherence of development, and hence the centre as a whole, which completes the experience of place that people will have. Recent development has often undermined the coherence of the borough's Town Centres in particular, poorly relating to the scale, structure, focus, variety, detailing, heritage and other place-making assets of the existing Town Centres. For this reason, the design of a new development should clearly reflect (but not uniformly copy) these aspects of character and the need to integrate and reinforce the positive ones to contribute to a distinctive place identity on either a neighbourhood or (in the case of larger centres) a centre basis. Here, visions also play a role, as detailed in spatial policies, alongside the management of the hierarchy and network (in line with Policy INF5) to ensure all retail and town centre uses are located within centres of appropriate sizes, alongside as far as possible, community infrastructure that draws in significant numbers of people (e.g. worshippers and service users). This includes avoiding retail and other similar commercial development on smaller sites outside centres that can incrementally undermine the coherence of them by eroding their boundaries and creating unfocused ribbon development, as evident along many of the borough's main roads and extending outwards from linear centres, notably East Ham, Green Street and Canning Town. A re-focusing of development within town centre boundaries, including relocation/residential conversion of existing out of centre commercial floorspace, together with improvements to gateways and more character-sensitive design, should help create a better sense of place.

## Implementation

- 6.63 Developers will be expected to respond to the above considerations in their Design and Access Statements and associated funding and management agreements, resulting in incremental change.
- 6.64 The Council and other public sector land owners will apply these considerations in their disposal of land assets and facilitation of change potentially through CPO powers, development agreements, and management of adopted public realm and work with local businesses and business groups.
- 6.65 Further guidance will be provided as necessary.

## Monitoring

- 6.65a The monitoring framework includes specific performance indicators relating to Successful Town and Local Centres upon which the relevance and efficacy of Policy SP6 will be assessed. Data is more readily available to assist monitoring of this policy than several of the other Successful Places policies due to extensive focus on the regeneration and socio-economic performance of the borough's town centres in both a local and London wide context. In addition, ongoing informal engagement with residents and elected members also provides important feedback about town centres.

### 6.65b Indicators

- i. SP-OUT1 Successful Place-making and Design:
  - a. Crime and fear of crime [No specific target, should be improving];
  - b. Satisfaction with the area [Maintain above 75%, should be improving];
- ii. SP-OP6 Supporting Quality Town and Local Centres:
  - a. Community uses in Town Centres [no specific target];
  - b. Town Centre Investment [no specific target, monitor for investment interest and increased diversity of uses in town centres];
- iii. SP-OP8 Policy Use and Robustness Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];
- iv. SP-OUT4 Town Centre Health:
  - a. Vacancy Levels and non-retail uses in primary frontages in town centres [no specific target, should be holding steady or improving, noting PSF benchmark in SP9];



- b. Historic buildings at risk within defined town centres [no specific target, should be decreasing];
- c. Monitor quality Leisure: Proportion of leisure uses in town centres that are betting shops, amusement arcades and hot food takeaways. [Target: benchmarks in SP9];
- d. Satisfaction with local shopping [no specific target, should be improving];
- e. Other town centre health check data published in GLA town centre health checks [no specific target, should be holding steady or improving].

## SP7 Quality Movement Corridors and Linear Gateways

Proposals that address the following strategic principles, spatial strategy, and design and management criteria will be supported:

### 1. Strategic principles

- a. As the borough's principal streets, the role of linear gateway and movement corridor will be reinforced through the application of improving and regenerative quality urban and architectural design and public realm interventions.

### 2. Spatial Strategy

- a. The desirability of reclaiming the streets for people through introducing active frontage to their edges that stimulates social activity and interaction along them;
- b. The importance of consolidating ribbon developments of commercial and community uses into defined Local and Town Centres and Local Shopping Parades, in line with Policies INF5, INF8 and SP6;
- c. The following are designated Key Movement Corridors and Linear Gateways (see attached map):
  - i. Barking Road (A124);
  - ii. Romford Road (A118);
  - iii. Forest Drive / Station Road / High Street North and South / Ron Leighton Way / Woolwich Manor Way;
  - iv. Manor Way / Albert Road / Pier Road (A117);
  - iv. Clegg Street / Pelly Road / Stopford Road / Upton Lane / Woodgrange Road / Woodford Road (A114);
  - v. Leytonstone Road / The Grove;
  - vi. Leyton Road / Angel Lane (A112);
  - vii. Stratford Gyratory (Great Eastern Road, Broadway and that part of Stratford High Street not within LLDC) (A11);
  - viii. West Ham Lane / Broadway / Plaistow Road / Plaistow High Street / Greengate Street / Prince Regent Lane / Victoria Dock Road (A112);
  - ix. Manor Road (A1011);
  - x. Bridge Road;

- xi. Densham Road / Portway / Plashet Road / Plashet Grove / East Avenue / Browning Road / Church Road / Little Ilford Lane (B165);
- xii. Vicarage Lane (B164);
- xiii. Green Street (B167);
- xiv. Katherine Road (B109);
- xv. Balaam Street;
- xvi. Hermit Road / Grange Road / Upper Road;
- xvii. Victoria Dock Road;
- xviii. Silvertown Way and Silvertown Viaduct / North Woolwich Road / Connaught Bridge / Royal Albert Way / Royal Docks Road (A1020);
- xix. Freemasons Road / New Barn Street / Butchers Road / Munday Road;
- xx. Stansfeld Road;
- xxi. Strait Road;
- xxii. Tollgate Road;
- xxiii. Connaught Road / Albert Road (A112);
- xxiv. Factory Road / North Woolwich Road;

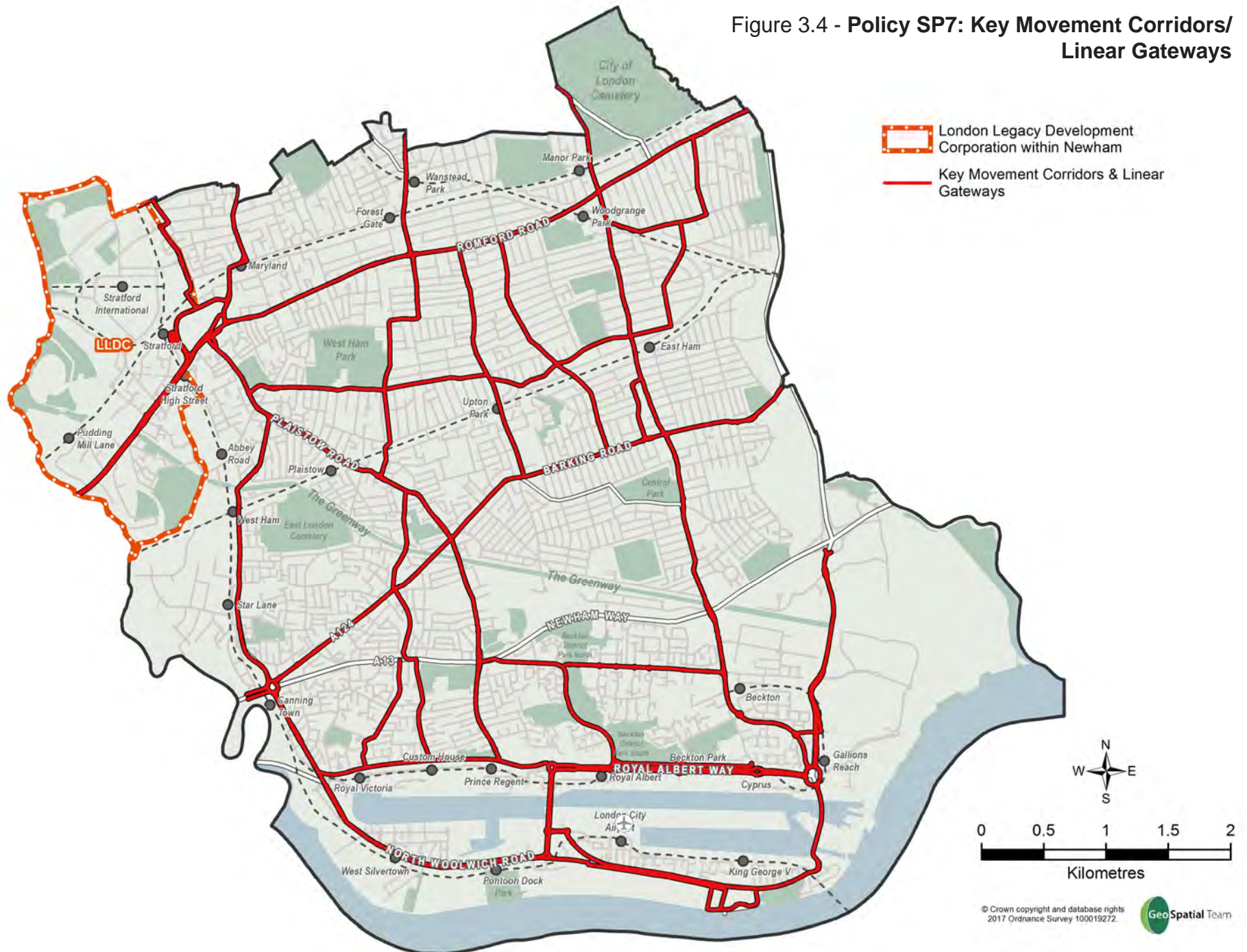
### 3. Design and management criteria

- a. The general principles of good urban design expressed in Policies SP1 and SP3 and SP5, ensuring they are extended to edge treatments to positively contribute to the street scene and way-finding;
- b. The particular need in these environments to enclose the street and reduce the noise and air pollution impacts of passing traffic, without creating a 'tunnel' effect, maintaining the building line excepting overriding good design or highways considerations;
- c. The need to significantly raise and easily maintain the quality of the public realm, with particular attention to de-cluttering, inclusive access, continuity of footways and materials, the value of tree planting to improve amenity and the desirability of introducing public art at appropriate locations; and
- d. The importance of facilitating the smooth and efficient but safe movement of traffic in the context of an overall shift to sustainable transport in line with policy INF2.

For the purpose of Neighbourhood Planning, the following sections and sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Spatial Strategy paragraph c only.

## Justification

- 6.67 Newham's arterial street corridors form strategic linear gateways to and within the borough, making an important contribution to people's impression of place and their perceptions of how attractive Newham is as a place to live, work and stay. The corridors have an important role to play in the overarching objective of the Local Plan to create high quality places. The arterial corridors are also important movement routes, for pedestrian, cycle and motor traffic including buses supporting the achievement of Good Growth. They link economically important centres and generally provide the shortest route ways between main centres of activity helping to deliver growth, and they provide locations for optimal development in the borough.
- 6.68 The objective of seeking improvements in the quality of corridors sets out to reinforce both of these roles, particularly in relation to how they form people's impression of routes towards central London and the local area. In doing so, the policy also seeks to reduce the linear 'barrier' effects felt by pedestrians and cyclists in particular, of major, often congested routes, and contribute to a lessening of congestion. Both barrier effects (connectivity) and congestion are noted to be key issues in the borough, congestion needing urgent attention due to the projected levels of new development in the borough and elsewhere. This has consequences for journey time and reliability, air quality, noise levels, the quality of the public realm, the health impacts of mode choice and people's quality of life concerns, also noted by national and London-wide policy.
- 6.69 Many measures contribute towards the policy's implementation in more than one of these dimensions. For example, making streets more pleasant places for people to use should encourage them out of their cars and into public spaces, which in turn helps to reduce traffic impacts and makes the area more liveable and more attractive generally. Animating streets and spaces by encouraging development with active frontages - windows and entrances, including appropriately-located community infrastructure, shops and street cafés - will also make streets safer and more interesting to use, particularly for pedestrians. Consolidating ribbon development into defined centres means that these destinations will be more clearly demarcated, reinforcing their viability, and tackling concerns about sprawling untidy frontages of mainly secondary retail, hot food takeaways and so on, which in stretching outside limited areas affect more people's amenity. This means that where expansion of such uses or changes of use within those classes are proposed in these streets outside the areas and other designations (e.g. Protected Isolated Shops) identified in the relevant infrastructure (INF5) and Spatial Policies, (SP2, SP3) the policy position will be to encourage instead, relocation to in-centre locations, de-conversion to residential where Policies H1, H4 and INF8 can be satisfied, or if necessary, continuation of the status quo.
- 6.70 Policies SP1, SP3 and SP5 establish the importance of key place-making and urban design principles. It is vital that these are extended into the street and in edge treatments, as these can have a particular impact on people's ease of navigation, entry and egress from buildings and spaces, sense of security and comfort. As well as activation and surveillance,

Figure 3.4 - Policy SP7: Key Movement Corridors/  
Linear Gateways



key considerations include improving enclosure, and mitigation of environmental impacts of traffic. Improving enclosure by maintaining the building line has positive microclimate effects, as well as being visually pleasing (creating a more complete and coherent street composition), though care must be taken not to over-enclose by building heights and massing that are not in proportion to the street width. Mitigation of noise and air pollution impacts requires appropriate spacing, screening, and filtering (e.g. by trees) without compromising other design principles such as surveillance, and attention to character, heritage assets and sustainability. Other measures include ensuring properties are dual aspect, so can ventilate from the non-road facing side.

- 6.71 On the street, the experience of pedestrians and other passers-by will also be affected by the quality of the public realm itself. Here, simplicity yet attention to detail and quality are what is required, as noted by good practice guidance and stakeholder engagement, with de-cluttering having a major role to play, subject to inclusive considerations. However, this should still allow for the incorporation of well-placed green infrastructure (particularly street trees) with its sustainability benefits, (drainage, air quality, shade and shelter) and public art. All these can improve the inclusivity of the environment, its functionality as a social space and movement space, and again the extent to which it is enjoyed.
- 6.72 Lastly, in the road, returning to movement from wider issues, relevant measures to help effect safe, smooth and efficient traffic movement, (also contributing to Policy INF2) will include those to balance competing space demands (traffic, pedestrian movements and infrastructure, parking and loading). One dimension to this will be improvements to dedicated infrastructure that supports walking, cycling and public transport use, including improved crossings, cycle tracks and lanes, bus priority measures and bus stop locations, whilst ensuring that this is consistent with de-cluttering, integrating it with the wider public realm scheme design.

## Implementation

- 6.73 Developers will be expected to address the various components of the policy through their Design and Access Statements.
- 6.74 The Local Implementation Plan sets out the borough's five year plan for delivering the Mayor's Transport Strategy locally, through expenditure of the borough's apportionment of Transport for London funding. Some of this will be spent in the above streets, alongside other Council Funding and S106 contributions, as directed by this policy.
- 6.75 The Council as a significant landowner will have regard to this policy in the management, development and disposal of its assets, working with adjacent landowners and developers.
- 6.76 Further guidance (and updates as appropriate) is as directed in the references to this section, but may also be provided through masterplans as necessary.

## Monitoring

- 6.76a The monitoring framework includes specific performance indicators relating to Quality Movement Corridors and Linear Gateways upon which the relevance and efficacy of Policy SP7 will be assessed. Outputs relate to environmental improvements to the corridors in

planning, regeneration and through complementary measures and will be drawn from general activity reporting (e.g. S106 monitoring). Specific outcomes difficult to measure, so outcomes are necessarily proxies monitored through corporate surveys. Ongoing engagement with residents, including formal evaluations certain schemes) of certain and elected members also provides useful feedback

#### 6.76b Indicators

- i. SP-OP7 Investing in Quality Corridors:
  - a. Monitor provision and loss of street trees [No specific target, should be improving];
  - b. Key Corridor & Healthy Streets investment [No specific target, should demonstrate commitment to policy objectives];
- ii. SP-OP8 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];
- iii. SP-OUT1 Successful Place-making and Design:
  - a. Crime and fear of crime [No specific target, should be improving];
  - b. Satisfaction with the area [No specific target, should be improving].

## SP8 Ensuring Neighbourly Development

Proposals that address the following Strategic Principles, Spatial Strategy and Design, Management and Technical criteria will be supported:

### 1. Strategic principles and Spatial Strategy

- a. All development is expected to achieve good neighbourliness and fairness from the outset by avoiding negative and maximising positive social, environmental and design impacts for neighbours on and off the site;
- b. The benefits of development and regeneration will be spread beyond the context of individual development proposals, in accordance with convergence aims;
- c. Change brought about by development must not cause problems for existing lawful neighbours, otherwise known as an 'agent of change' approach; and
- d. The Council encourages innovative approaches to achieving neighbourliness.

### 2. Design, Management and Technical Criteria

- a. Compliance with the standards and due regard to the importance of the technical guidance in Table SP.E where they are relevant to development proposals, will be expected to promote neighbourliness in addressing the need to:
  - i. Ensure integration with the street scene including consideration for advertisements and signage; boundary treatments; parking provision; external storage; plant housing and the quality of materials;
  - ii. Create a safe and secure environment by reducing the likelihood of antisocial behaviour, promoting public safety (including road safety), improving security and lessening the fear of crime in accordance with policies SP1, SP2 and SP3;
  - iii. Ensure that buildings and other spaces likely to involve the congregation of people are well managed and address the street and neighbourhood in terms of character and orientation, legibility, inclusivity and an obvious and welcoming access;
  - iv. Protect and enhance accessibility, local connectivity and permeability;
  - v. Prevent the loss of, and where possible enhance on and off site green infrastructure, including public open space, private amenity space, trees and woodland in accordance with policies SC1, SC4, and SC5, SP2 and INF6 & 7;



- vi. Avoid creating or exacerbating off-site flood risk in accordance with policies SP9, SC3 and SC5;
- vii. Protect the locality from adverse microclimate effects (such as wind tunnelling) in accordance with policies SP4 and SP7;
- viii. Minimise impacts of development's interference with broadcasting and other telecommunications services;
- ix. Encourage the use of sustainable transport and minimise parking stress in the neighbourhood including the provision of publicly accessible car club spaces and electric car charging points in accordance with policy INF2;
- x. Achieve a high standard of access, egress and circulation for all, including through the provision for waste, recycling and bicycle storage facilities; the siting of parking provision and design legibility;
- xi. Avoid unacceptable exposure to light (including light spillage), odour, dust, noise, disturbance, vibration, radiation and other amenity or health impacting pollutants in accordance with policy SP2;
- xii. Ensure adequate access to daylight and sunlight in accordance with policy SP3;
- xiii. Minimise overlooking and loss of privacy, overshadowing, and overbearing impact; and
- xiv. Make appropriate provision for communal spaces and private amenity spaces (e.g. bedrooms and places of retreat) in multiple-user buildings (including HMOs) and should take into account any losses incurred.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles and Spatial Strategy.

**Table SP.E Environmental standards and guidance**

Issue	Standard or Guidance*
<b>Telecommunications</b>	International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines <sup>1</sup>
<b>Radioactive sources and x-ray generators</b>	National Radiological Protection Board (NRPB) guidelines <sup>2</sup>
<b>Light Spillage</b>	GLA: Sustainable design and construction SPG (2014) <sup>3</sup>  Department for Environment, Food and Rural Affairs (DEFRA) guidance on sections 101 to 103 of the Clean Neighbourhoods and Environment Act 2005, titled 'Statutory nuisance from insects and artificial light' <sup>4</sup>  Institute of Lighting Professionals: Guidance notes for the reduction of obtrusive light. <sup>5</sup>
<b>Odour and Fumes</b>	DEFRA guidance manuals for regulation of businesses that produce pollution <sup>6</sup>  Environment Agency (EA), H4 Odour Management. <sup>7</sup>
<b>Dust</b>	GLA: Control of dust and emissions during construction SPG (2014) <sup>8</sup>
<b>Noise</b>	DEFRA: Noise Policy Statement for England <sup>9</sup>  Education Funding Agency: BB93 Acoustic design of schools: performance standards <sup>10</sup>  British Standards:  BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise <sup>11</sup>  BS 5228-2:2009+A1:2014 Code of practice for noise and

<sup>1</sup> <https://www.icnirp.org/>

<sup>2</sup> <https://www.gov.uk/government/collections/national-radiological-protection-board-nrpb-report-series>

<sup>3</sup> [https://www.london.gov.uk/sites/default/files/gla\\_migrate\\_files\\_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf](https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf)

<sup>4</sup> <http://webarchive.nationalarchives.gov.uk/20130403014759/http://archive.defra.gov.uk/environment/quality/local/legislation/cnea/documents/statnuisance.pdf>

<sup>5</sup> <https://www.theilp.org.uk/resources/free-resources/>

<sup>6</sup> [Environmental Permitting: General Guidance Manual on Policy and Procedures for A2 and B Installations](#) , and other business-specific guidance that may apply

<sup>7</sup> <https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management>

<sup>8</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/control-dust-and>

<sup>9</sup> <https://www.gov.uk/government/publications/noise-policy-statement-for-england>

<sup>10</sup> <https://www.gov.uk/government/publications/bb93-acoustic-design-of-schools-performance-standard>

<sup>11</sup> <https://shop.bsigroup.com/ProductDetail?pid=00000000030258086>

Issue	Standard or Guidance*
<b>Noise (continued)</b>	<p>vibration control on construction and open sites – Part 2: Vibration<sup>12</sup></p> <p>For plant noise on residential and commercial/ industrial premises: BS 4142:2014 Methods for rating and assessing industrial and commercial sound.<sup>13</sup></p> <p>For controlling internal and external noise within a development: BS 8233:2014 Guidance on sound insulation and noise reduction for buildings.<sup>14</sup></p>
<b>Vibration</b>	<p>British Standard:</p> <p>BS 7385-2:1993 Evaluation and measurement for vibrations in buildings<sup>15</sup></p> <p>BS 6472-1:2008 Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting.<sup>16</sup></p>
<b>Ground/Soil Pollutants - contaminated land</b>	<p>London Borough of Newham: Contaminated Land Strategy 2003<sup>17</sup></p> <p>LQM/CIEH: Suitable 4 Use Levels<sup>18</sup></p> <p>DEFRA: Environmental Protection Act 1990: Part IIa Contaminated Land Statutory Guidance, 2012<sup>19</sup></p> <p>DEFRA and EA: The Model Procedures for the Management of Land Contamination, 2004 (CLR11)<sup>20</sup></p> <p>British Standards: BS 10175:2011+A2:2017: Investigation of potentially contaminated sites – Code of practice<sup>21</sup></p>

<sup>12</sup> <https://shop.bsigroup.com/ProductDetail?pid=000000000030258089>

<sup>13</sup> <https://shop.bsigroup.com/ProductDetail?pid=000000000030268408>

<sup>14</sup> <https://shop.bsigroup.com/ProductDetail?pid=000000000030241579>

<sup>15</sup> <https://shop.bsigroup.com/ProductDetail?pid=000000000000315191>

<sup>16</sup> <https://shop.bsigroup.com/ProductDetail?pid=000000000019971044>

<sup>17</sup> <https://www.newham.gov.uk/Documents/Environment%20and%20planning/2003%20Contaminated%20land%20strategy.pdf>

<sup>18</sup> <http://www.lqm.co.uk/publications/s4ul/>

<sup>19</sup> <https://www.gov.uk/government/publications/contaminated-land-statutory-guidance>

<sup>20</sup> <https://www.claire.co.uk/information-centre/water-and-land-library-wall/45-model-procedures/187-model-procedures>

<sup>21</sup> <https://shop.bsigroup.com/en/ProductDetail/?pid=000000000030362551>

Issue	Standard or Guidance*
<b>Air Quality</b>	<p>Air Quality (England) Standards Regulations 2010<sup>22</sup></p> <p>GLA: London-Environment-Strategy 2018<sup>23</sup></p> <p>GLA: Control of dust and emissions during construction SPG (2014)<sup>24</sup></p> <p>London Borough of Newham: Air Quality Action Plan and related updates and documents<sup>25</sup></p> <p>DEFRA and Department for Transport (DFT): Air Quality Plan for Nitrogen Dioxide (NO2) in UK<sup>26</sup></p>
<b>Anti-social Behaviour/Crime/Safety (including road safety)</b>	<p>Design Council: Building for Life 12<sup>27</sup></p> <p>Secured by Design design guides<sup>28</sup></p> <p>TfL: London Cycle Design Standards (LCDS)<sup>29</sup></p>
<b>Car Parking &amp; Charging Points and cycle parking</b>	<p>GLA: London Plan Parking policy (currently Policy 6.13)<sup>30</sup></p> <p>Design Council: Building for Life 12:10 (Car parking)<sup>27</sup></p> <p>GLA: Accessible London SPG<sup>31</sup></p> <p>TfL: London Cycle Design Standards (LCDS)<sup>29</sup></p>
<b>Daylight/Sunlight</b>	<p>Building Research Establishment (BRE): Site layout planning for daylight and sunlight: a guide to good practice (BR209)<sup>32</sup></p>
<b>Overall Neighbourhood Design and Management including permeability, accessibility and local connectivity</b>	<p>Design Council: Building For Life (BFL) 12<sup>27</sup></p> <p>London Borough of Newham: Character Study (2016)<sup>33</sup></p>
<b>Refuse, post deliveries, storage (including recycling) and utility</b>	<p>GLA: Housing SPG 2016<sup>34</sup></p> <p>London Borough of Newham: Waste Management Guidelines for Architects and Property Developers<sup>35</sup></p>

<sup>22</sup> <http://www.legislation.gov.uk/ukxi/2010/1001/contents/made>

<sup>23</sup> <https://www.london.gov.uk/what-we-do/environment/london-environment-strategy>

<sup>24</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/control-dust-and>

<sup>25</sup> <https://www.newham.gov.uk/Pages/Services/air-quality.aspx>

<sup>26</sup> <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

<sup>27</sup> <https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition>

<sup>28</sup> <http://www.securedbydesign.com/industry-advice-and-guides/#dsgngd>

<sup>29</sup> <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>

<sup>30</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan>

<sup>31</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/creating-london>

<sup>32</sup> <https://www.brebookshop.com/details.jsp?id=326792>

<sup>33</sup> <https://www.newham.gov.uk/Pages/Services/Planning-policy.aspx>

<sup>34</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/housing-supplementary>

Issue	Standard or Guidance*
Refuse, post deliveries, storage (including recycling) and utility (continued)	Design Council: Building For Life (BFL) 12:12 (External storage and amenity space) <sup>27</sup>
Housing Design (private amenity space/space standards)	GLA: Housing SPG 2016 <sup>36</sup> Design Council: Building For Life (BFL) 12 <sup>37</sup> GLA: Play and Informal Recreation SPG (2012) <sup>38</sup>
Trees and Woodland	BS 5837:2012 Trees in relation to design, demolition and construction <sup>39</sup>

\*Standards or guidance shall be deemed to relate to the most up to date version in place to the same intention and effect, accounting for the fact that current standards and guidance may be amended, restated and/ or replaced from time to time.

## Justification

- 2.7a The Local Plan seeks the creation of successful, healthier and safer places, and in doing so, the securing of improvements to character and the successful integration of different land uses that are necessary to meet the range of needs (including residential, commercial, industrial and infrastructural) optimising development in a way that is both neighbourly and fair. Policies SP1-7 seek to create successful places, healthy neighbourhoods and quality design. The vision in turn, seeks transformation of these characteristics to make it much more likely that people will choose to live, work and stay in the area and achieve improvements to health and deprivation so Newham is more like the rest of London.
- 2.7b Much of the Borough comprises already dense development where the scope for transformational change rests on the cumulative impact of smaller scale changes (Urban Newham). In these areas, many of the existing problems that people are concerned with, and those that they expect to be worsened by new development, are 'neighbour related' and linked to very specific aspects of design. Moreover, a key component of the overall spatial strategy promoted by the Plan is to promote higher densities and new forms of mixed use development in the Arc of Opportunity and Town Centres, where the impact of neighbours becomes more significant.
- 2.7c Further to this, design/place-quality, housing quality and transport policies provide a good basis for the scrutiny of neighbour impacts, given that high quality development by definition should not result in adverse impacts on surrounding occupiers, and should encourage positive behaviours relating to broader objectives. However this policy provides specifications around the aspects that cause most concern as well as emphasises the

<sup>35</sup> <https://www.newham.gov.uk/Pages/Services/waste-management-new-developments.aspx?l1=100003&l2=200084>

<sup>36</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/housing-supplementary>

<sup>37</sup> <https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition>

<sup>38</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/play-and-informal>

<sup>39</sup> <https://shop.bsigroup.com/ProductDetail?pid=000000000030213642>

potential for a more rounded, positive approach to neighbourliness that is aligned with the Council's Resilience Agenda and convergence objectives.

- 2.7d The policy builds on the 'agent of change' principle, whereby it is considered to be the responsibility of the developer of the new use/development to ensure remediation measures to address the potential negative impact on existing lawful uses before it happens. The agent of change approach will be particularly relevant in the Arc of Opportunity where [new] residential development is juxtaposed with existing and intensifying industry, and the airport, and other transport and utilities infrastructure are also operating alongside new and existing housing; and in town centres where evening economy uses are increasingly interspersed with residential.
- 2.8 All scales of development (including domestic extensions, or conversions and changes of use) have the potential to impact upon neighbours and the neighbourhood from the start of construction through to the on-going operation of a site. This policy addresses a range of neighbourliness issues and sets out appropriate responses ranging from designing out (mitigation) to designing in (attention to detail) to contribute positively to neighbourly development. This includes adequate access and egress, connectivity with the local neighbourhood, legibility of refuse and other storage, appropriate parking arrangements as well as the qualitative aspects of street scene, all of which impact local character.
- 2.9 The social and environmental impacts of development, if inadequately managed or mitigated, can negatively affect the health and well-being of people and the overall ability of a place to function successfully. This policy incorporates requirements of the Healthy Urban Planning Checklist to ensure health and wellbeing and Building for Life guidance generated from research about people's feelings about new development and the main issues arising, is properly considered in new development at the building, site and wider neighbourhood level. This includes very specific aspects of housing quality, and public realm [interface] management. As standards improve people will begin to feel more positive about development in their local area, which is in itself a key aspect of achieving neighbourliness.
- 2.10 Planning is key to ensuring new development does not create problems of conflicting land uses, for example where residential uses are introduced within or adjacent to employment areas. Good planning needs to ensure for instance that local business and the economic life of the Borough is not constrained by noise and fume complaints. Likewise, good telecommunications and broadcasting services are a key component of supporting high quality communications. The siting and design of new developments are expected to consider the interference with broadcasting and telecommunications infrastructure which are a key to the enhancement of modern communities in accordance with the NPPF.
- 2.10a Larger new development can also significantly affect microclimates, e.g. through downdraughts and wind tunnelling, particularly when tall buildings are constructed. Neighbourly design will be expected to take into account impacts on the surrounding area and minimise negative impacts outside the development site that affect the character and quality of the area and the spaces around buildings which people can enjoy. These impacts in turn can have wider health impacts as well as affecting people's perception and enjoyment of place at all times.

- 2.12 The Policy also seeks to reinforce the protection and enhancement of green infrastructure, in line with broader strategic priorities set out elsewhere in the Local Plan, specifically recognising its relevance in relation to the achievement of neighbourly development due to its environmental and quality of life benefits. In doing to, policy requires proposals to take into account any potential on or off site impacts (both direct and indirect) which could lead to quantitative or qualitative loss of green infrastructure, including private amenity space, trees, woodland, and public open space. This includes adequate consideration of negative impacts on biodiversity elements (e.g. via indirect ecological pathways such as impacts on drainage, habitat connectivity and shadowing). In relation to private amenity space, the policy protects garden land from development that results in its loss, in line with the NPPF and London Plan Policy 3.5, seeking to recognise its role in providing for relief from urban intensity and as places of retreat. Proposals however should seek not simply to avoid such impacts, but to take opportunities to positively contribute to quality, quantity or accessibility of green infrastructure provision on or off site, including where appropriate, improvements to cross boundary accessibility (such as in the case of the Lee Valley Regional Park).
- 2.13 The environmental standards and design guidance in Table SP.E set out to assist developers in the creation of successful, healthy and safe places through the use of recognised quality benchmarks and standards which in turn are used to help assess developments' neighbourliness. Such standards play a key part in defining for example, how places can be designed to ensure all that need to, or would benefit from doing so, can access development with equitable ease.
- 2.14 All the aspects of the policy work together to impact on the nature of a place, neighbourhood or building, and the extent to which people can live happily, healthily and resiliently.

## Implementation

- 2.14a Overall the policy aims to ensure the maximum benefit of development (in accordance with convergence aims) is sought and that development contributes positively to the creation of a high quality built environment and local perception of place.
- 2.15 Policy will be implemented primarily via the development management process. Other policies to which there is a logical link are highlighted encouraging responses that deal with the issues in an integrated way. Proposals should be accompanied by statements detailing their response to the components of Neighbourly Development set out in the policy in design and management terms. Information should be sufficient to make adequate assessment against the required guidance and standards. Where necessary, neighbourliness measures will be secured by condition and/or legal agreement.
- 2.16 The policy intention is that applicants should pay attention to the environmental, social and design based impacts of their proposals on neighbourliness within the site and in the immediate area. In positive planning terms, the idea is to maximise the benefit of development through the ways in which it interacts with and plays its part in the wider context It should encourage, for example car club spaces open to all to reduce parking

stress and secure more sustainable travel behaviours in a neighbourhood as a whole, a new development providing a missing walking network link through the site, or a new building for a particular community designed to respond to a more general lack of community space and to be welcoming to all. Early consideration of these matters will be encouraged through pre-application advice/design review and in implementing other consents approaches such as Permission in Principle, as well as through more proactive regeneration and local implementation plan work.

- 2.16a In promoting an Agent of Change approach to new development it is important that consultation should take place with existing operators/occupiers to ensure that new development is deliverable and that the two uses are able to operate alongside each other; not just physical neighbours but also river, air and highway traffic regulated by the Port of London Authority (PLA), Civil Aviation Authority (CAA) and Transport for London (TfL) who should also be consulted. It is recognised that the presence of London City Airport in close proximity to high profile regeneration sites creates particular sensitivities in terms of high levels of background noise at these new residential developments. Higher development costs are to be anticipated in these areas because of the necessity for effective design and building interventions that will enable residential development to proceed in areas that might otherwise have been considered unsuitable. Similarly, effective noise insulation of existing housing in the vicinity of the airport is desirable to protect living conditions. At the same time, the Agent of Change approach should not be construed as offering a licence to existing operators and occupiers for the unfettered intensification of disturbance-generating activity or other unreasonable behaviour: it is assumed that uses should be operating lawfully and reasonably.
- 2.17 To support applications, proposals should pay attention to the quality benchmarks and standards and associated guidance set out in Table SP.E. Expert advice will be taken within the Council or relevant partners to support these assessments and to ensure proposals are of the highest quality and address Neighbourly Development from the outset, and these benchmarks, standards and guidance documents are important to make that assessment. Where a development concerns an existing building (through conversion, extension, change of use) which does not meet such standards, this will be a consideration in itself as regards its suitability for the proposed change.

## Monitoring

- 2.17a The monitoring framework covers many aspects of design quality that relate to neighbourliness, including monitoring of housing standards, electric vehicle charging points, flood risk mitigation and design quality auditing, as such, this policy does not have specific output indicators of its own, other than a policy use and robustness requirement. Outcome indicators of particular relevance will be satisfaction with the area, environmental nuisance levels, road traffic casualties, air quality, traffic congestion, and crime/fear of crime levels reported under other policies. Outcomes relating to the wide concept of neighbourliness are difficult to measure, so some indicators (notably community cohesion, satisfaction with the area) are necessarily proxies monitored through corporate surveys. Ongoing informal engagement with residents and elected members, and complaints data also provides useful feedback on neighbourliness issues.

### 2.17b Indicators



- i. SP-OP8 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];
- ii. SP-OUT1 Successful Place-making and Design:
  - a. Crime and fear of crime [no specific target, should be improving];
  - b. Satisfaction with the area [maintain above 75%, should be improving].

## SP9 Cumulative Impact

Proposals which address the following strategic principles, spatial strategy and technical criteria will be supported

### 1. Strategic principles

- a. All development proposals will be expected to avoid creating or adding to problematic cumulative impacts, helping instead to engender healthy, successful places, creating sustainable development recognising the cumulative effect individual units and specific uses can have on the success of places.

### 2. Spatial Strategy

- a. Within the following areas of cumulative impact concern particular impacts should not be added to, and should preferably be ameliorated.

Table SP.F Areas of Cumulative Impact Concern

Area	Impact of concern	More detailed policy requirements
Air Quality Management Area(s) (AQMA(s))	An increase in the concentration of specified pollutants or increased exposure to them.	SP2 & SC5
Water Quality Stress Zones	Water quality.	SC4
Critical Drainage Areas and Flood Zones 2 and 3	Run off and flood risk from surface water run-off or fluvial and tidal sources	SC3
Areas of Parks Deficiency	Distance to parks of particular sizes and any loss of parks, or their functionality, or other loss of open space/blue ribbon assets that provides compensation for lack of park access of a particular type.	INF7
Congestion Zones	Congestion.	SP3, SP7 and INF2
Licensing Saturation Policy Zones	Crime and Disorder; Public Nuisance; Protection of Children from Harm.	SP2 and SP6
Health and Safety Executive Consultation Zones	Risk to people from Major Hazard Sites and Pipelines.	SP2
Public Safety Zone (Airport)	Risk to life by presence of people.	INF1, SP2

### 3. Design & Technical Criteria

- a. In town centres, the need ensure that:

- i. Within Primary Shopping Frontages (as shown on the Policies Map), 70% of units are in A1 use;

Note: A unit comprises a single frontage premises in accordance with street naming and numbering; and

- ii. At least two-thirds of town centre leisure uses are to be 'Quality leisure' uses. Units in Class D2, A4 or A3 use should therefore account for at least 67% of leisure uses, and Class A5 uses, amusement arcades and betting shops should not account for more than 33%;

and

- b. In all areas, the need to avoid over-concentration of specific uses (currently betting shops, takeaways, and nightly-stay hostels) by ensuring that:

Linear concentrations:

- i. No more than-two of the same specified uses are adjacent to each other; and
- ii. There is a separation distance of at least two units in other uses between pairs (or groups if more than two units) in the same specified use; or

Area concentrations:

- iii. There are no more than three premises in the same specified use within 400m of each other; and
- iv. A 400m catchment drawn around a proposed specified use does not overlap with any more than two other catchment areas drawn around existing, committed or proposed units in the same specified use.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a Neighbourhood Plan should conform: 1.Strategic Principles; 2.Spatial Strategy.

## Justification

- 2.20 In Urban Newham a concerted effort needs to be made to ensure that every small change counts, preventing existing problems getting worse, beginning to reverse them, and thereby setting in train more positive circles. This approach will support the overarching objective in the Local Plan to create high quality places and balanced communities. Where the combined impact of new development adds up to something of greater significance (positive or negative) than when assessed on its own, this is summarised as having 'cumulative impact'. Whilst policy already highlights problems of cumulative impact as a design consideration, this policy provides clearer direction in terms of the range of cumulative impact issues that should be considered. Recognition and effective handling of



Figure 3.5 - Policy SP9: Cumulative Impact - Area Concentrations

## Cumulative Impact Policy SP9 - Test Examples

### Cumulative Impact Policy SP9 3 b. (iii) and (iv)

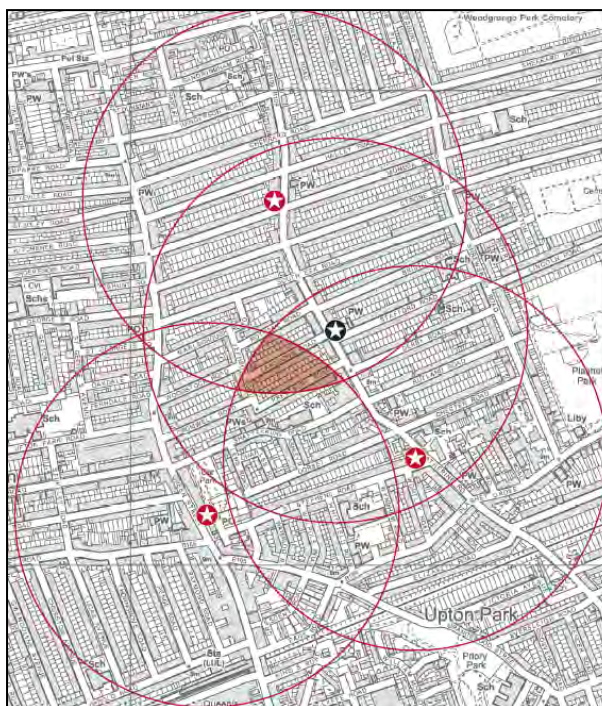
Example of an **acceptable** location for a specified use under the 400m proximity and catchment area tests.



This proposal is acceptable because it would not result in more than three premises in the same specified use with overlapping 400 metre catchment areas; and because it would not result in more than three premises in the same specified use within 400 metres of each other.

### Cumulative Impact Policy SP9 3 b. (iv)

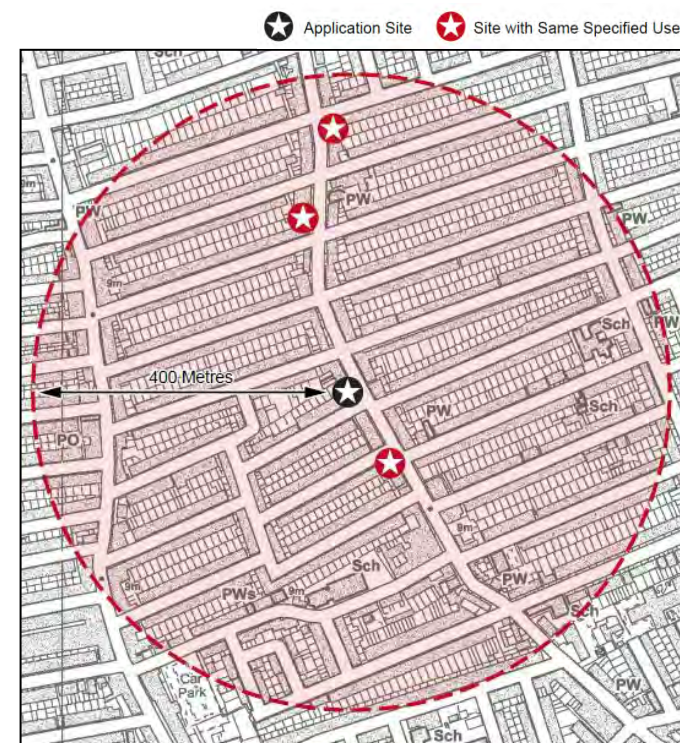
Example of an **unacceptable** location for a specified use under the 400m catchment areas test.



This proposal is unacceptable because it will result in more than three premises in the same specified use with overlapping 400 metre catchment areas. The intersection of the four catchment areas is shown shaded.

### Cumulative Impact Policy SP9 3 b. (iii)

Example of an **unacceptable** location for a specified use under the 400m proximity test.



This proposal is unacceptable because it will result in more than three premises in the same specified use within 400 metres of each other.



Figure 3.6 - Policy SP9: Takeaway (A5) Hotspots

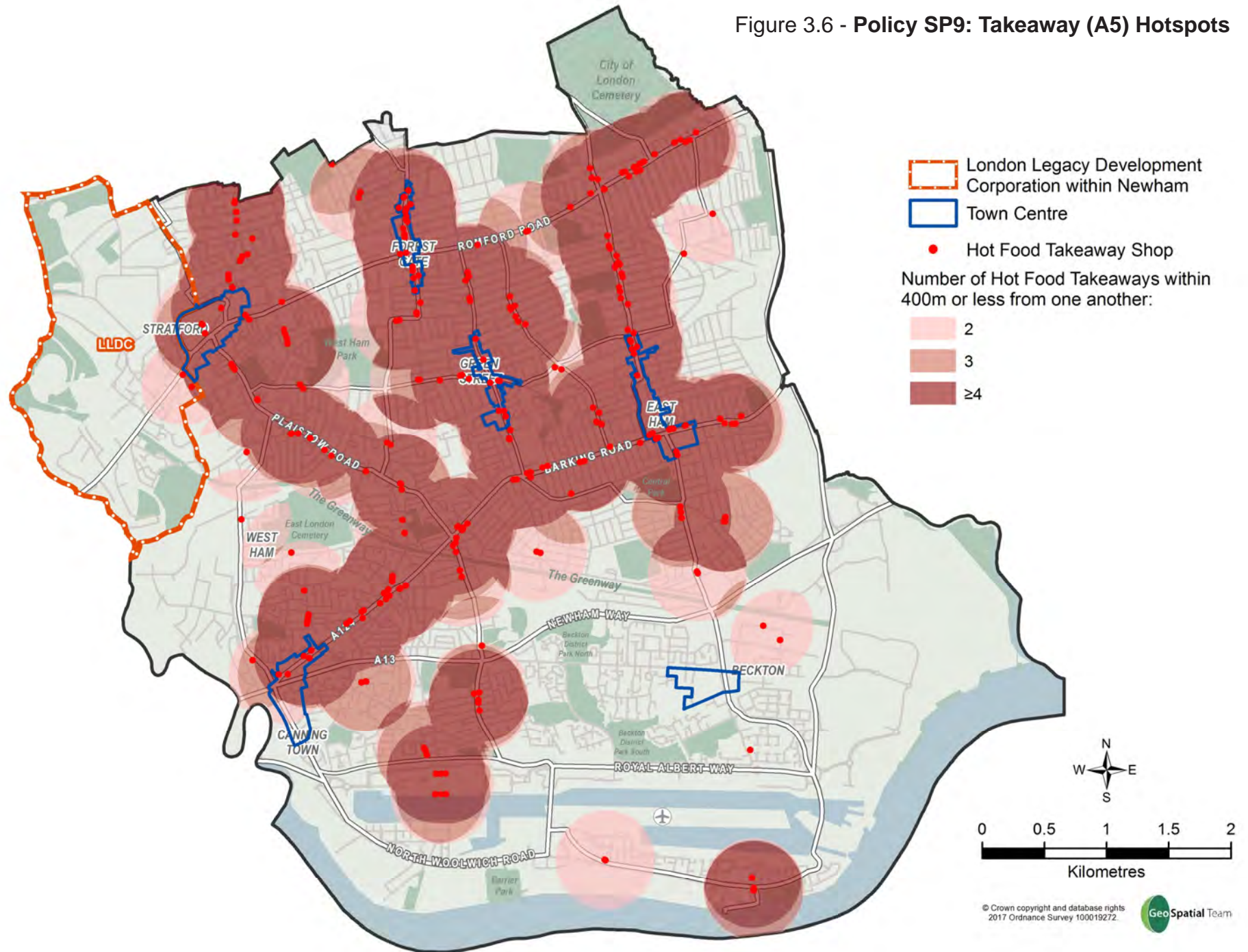


Figure 3.7 - Policy SP9: Betting Shop Hotspots

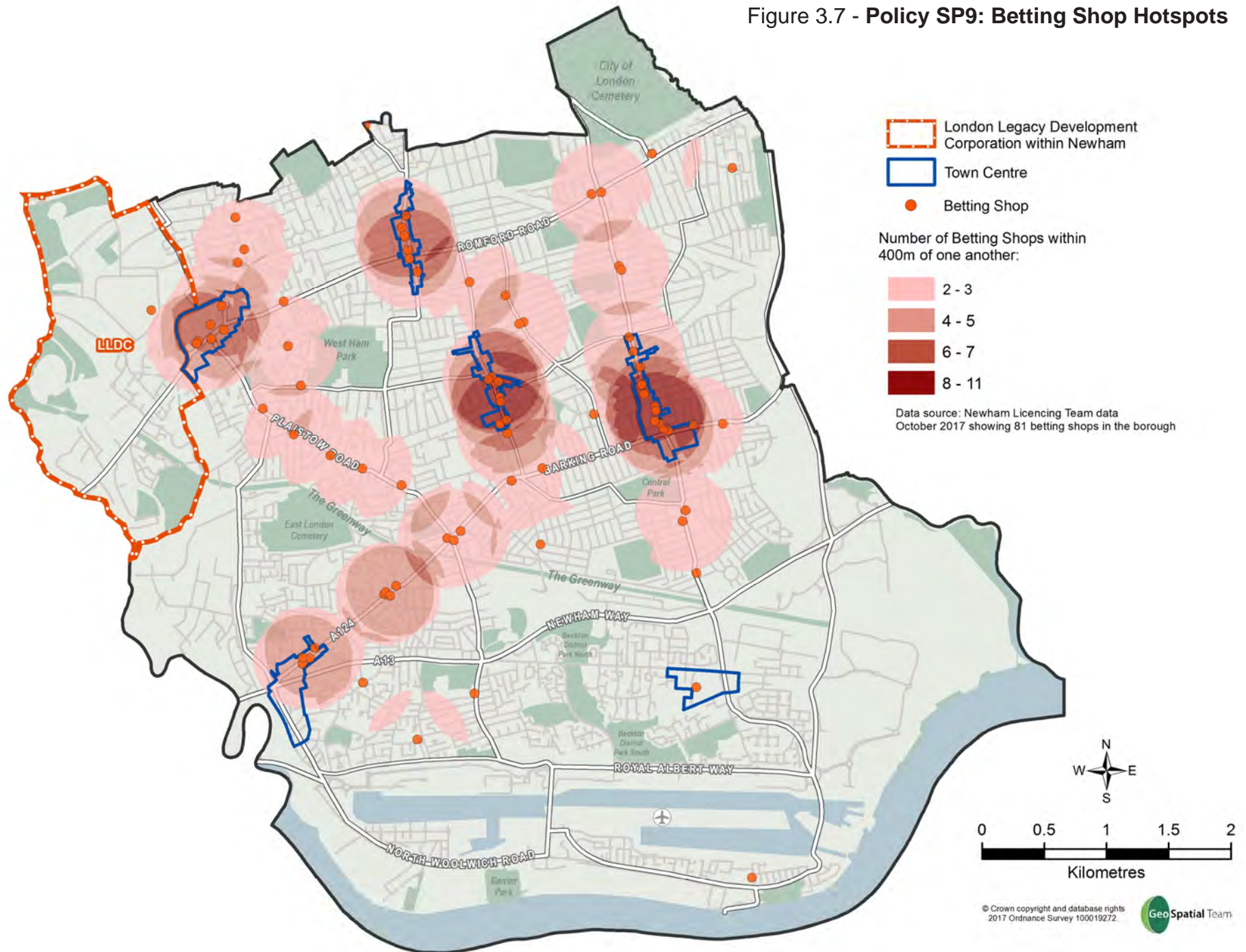




Figure 3.8 - Policy SP9: Hostel Hotspots

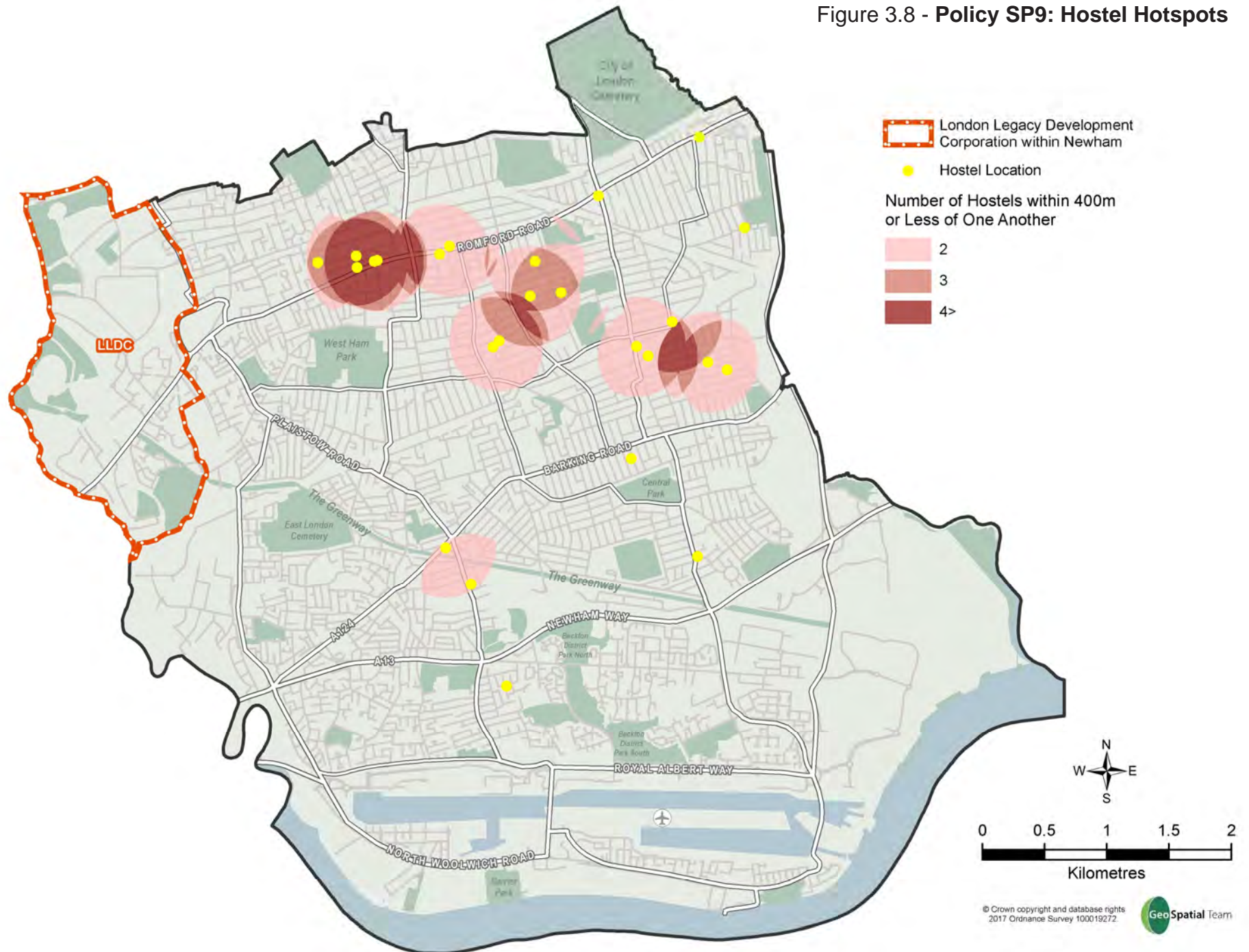
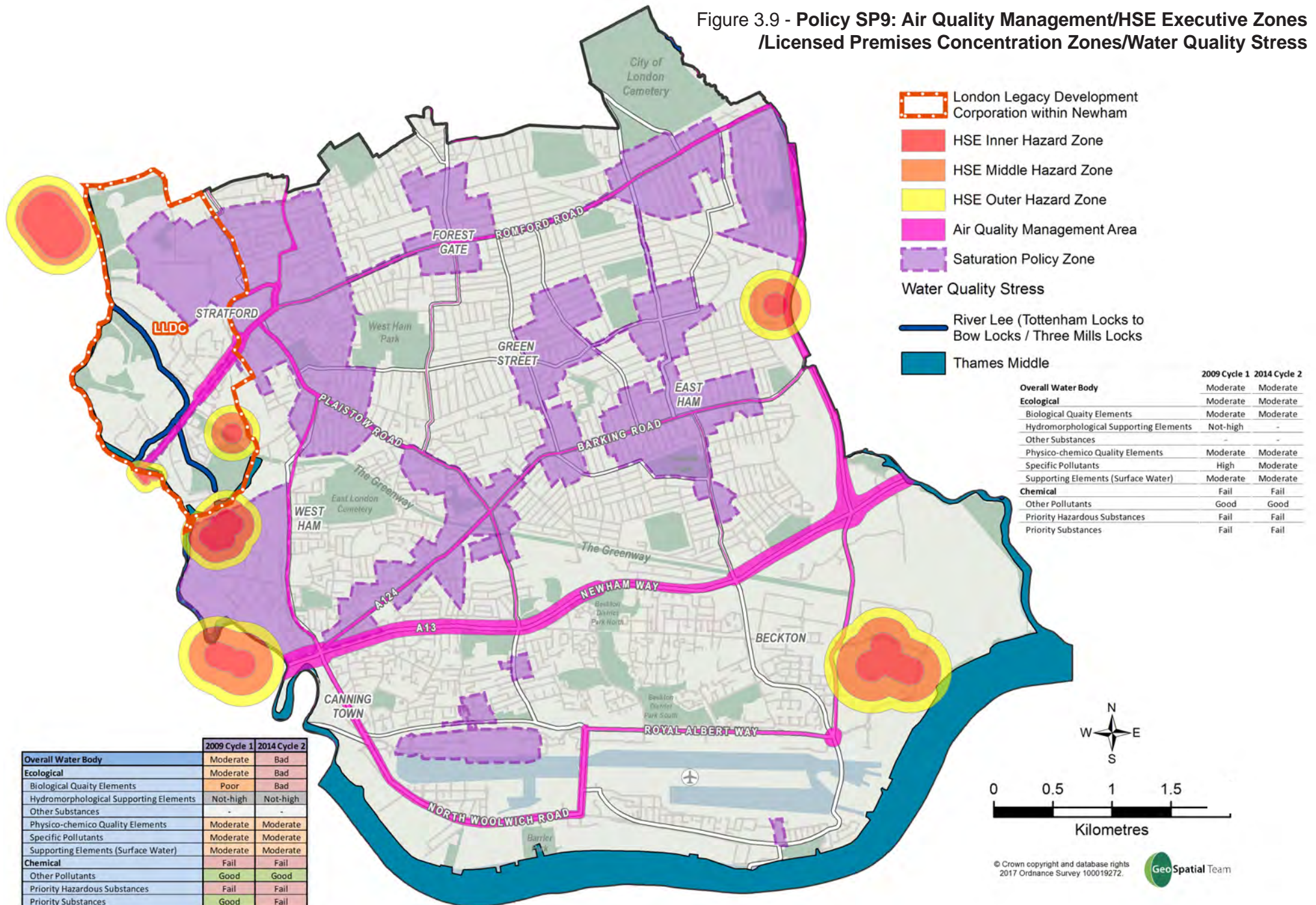




Figure 3.9 - Policy SP9: Air Quality Management/HSE Executive Zones /Licensed Premises Concentration Zones/Water Quality Stress





cumulative impact will optimise development and help to deliver growth in the borough, which are also two of the overarching objectives of the Local Plan.

- 2.21 Negative effects where cumulative impact is (or may be in certain areas) significant, range from traditional amenity and environmental concerns (noise and activity levels at unusual hours; odour, air and light pollution; traffic congestion; microclimate and drainage effects; litter and visual intrusion) to impacts on safety risks and behaviour as well as the character and liveability concerns of an area. Such negative impacts may affect health and wellbeing, and the extent to which people are satisfied with an area or prepared to visit, invest, spend and stay in that area e.g. affecting regeneration and investment prospects, impeding the delivery of sustainable development.
- 2.22 Some cumulative impacts do not have spatial indicators to allow them to be measured (i.e. daylight/sunlight). However, the cumulative significance of certain impacts is already recognised through existing designations derived through established methodologies or legislation. These include the Air Quality Management Area, Water Quality Stress Zones, Critical Drainage Areas and Flood Zones, Airport Public Safety Zone, areas of park / access-to-nature deficiency, Health and Safety Executive Consultation Zone and the Licensing Saturation Policy Zones. These are drawn together under this policy to emphasise their significance for planning purposes, particularly at the design stage. In addition, the policy and associated designations sets out new areas – informed by an updated evidence base – that address other deficiencies and excesses and take opportunities for encouraging more virtuous cumulative impact processes. These include Congestion Zones (TFL traffic-flow monitoring, areas of significant delays), and Sustainable Travel Opportunity Areas.
- 2.23 The issues addressed by these designations are relevant to all forms and scale of development. In assessing appropriate responses to these designations as directed by the policy, the advice of internal and external experts will be sought where appropriate
- 2.23a In Newham uses such as hot food takeaways, betting shops, premises selling alcohol / entertainment premises, and private rented properties, mainly HMOs and specialist hostels, are noted as having a potential problematic cumulative impact when numbers increase. Various problems arise through overconcentration of uses, including impacts on an area's character as well as healthy lifestyles of the population. With these types of issues, cumulative impact will be about the extent to which a use or activity affects the feel and appearance of an area.
- 2.23b Local Plan Core Strategy Policy SP6 already seeks to maintain a robust retail core, where non-retail uses are prevented from clustering. To further manage negative cumulative impacts, the policy targets potential problematic uses, defining a minimum proportion of more desirable uses in certain areas, as well as 'tipping points' at which numbers of such uses cumulatively (clusters) are unacceptable. These have been derived through a combination of engagement and spatial analysis, recognising the impact of patterns of land use across small spatial extents, 400m being a typical five-minute walk time.
- 2.23c In the case of linear concentrations, assessment will ignore intervening road junctions and continue around corners where relevant. In terms of area concentrations, Hot Food Takeaway Hotspots, Betting Shop Hotspots and Night-stay Hostel Hotspots maps above

provide indicative mapping of existing uses, identifying 'hotspots' where three or more 400m catchment areas overlap and where further proposals for identified uses will exceed the policy threshold will not generally be supported. The other Areas of Cumulative Impact map sets out Air Quality Management Areas, HSE Executive Zones and Licensed Premises Concentration (Saturation Policy) Zones and Water Quality Stress Areas.

### Origins of Cumulative Impact Zones

- 2.24 Aside from the Airport Public Safety Zone, the designated Cumulative Impact Zones are not included on the Local Plan Policies Map. Maps of the zones can be found in Appendix 1.
- 2.25 **Air Quality Management Areas** (see Figure 3.9 above) are zones identified as in need of particular air quality management measures due to the extent of air quality 'exceedances' i.e. days when air quality limits exceed national guidelines, and hence the failure to meet air quality objectives. As such, anything that is likely to increase emissions of targeted pollutants (in this case, particulates and nitrogen dioxide) or increase exposure to them is likely to be of concern, and require at least mitigation. In assessing this, advice will be sought from Environmental Health and the Environment Agency.
- 2.26 **Areas of Water Quality Stress** (see Figure 3.9 above) shows areas identified in the Environment Agency's River Basin Management Plan (2009, as updated in 2012) as in need of improvement through a variety of in-river and adjoining site management interventions in respect of particular water quality features (e.g. levels of ammonia, phosphate, dissolved oxygen). It is proposed that these are designated in cumulative impact terms to secure at least no-net-worsening of water quality, and preferably a positive response that contributes to improvements, in accordance with policies SC4 and INF7 which require the protection and enhancement of aquatic and riparian habitats. Proposals should have regard to the EU Water Framework Directive and the recommendations and objectives of relevant River Basin Management Plans.
- 2.27 **Critical Drainage Areas** (see policy SC3 map, Figure 5.1) were identified as part of Newham's 2011 Surface Water Management Plan, they are defined as the contributing catchment areas that feed into /influence the predicted flood extent (where flood risk might otherwise be low). Within these areas drainage problems are already significant and should not be worsened by new development and instead should be improved by it.
- 2.28 **Flood Zones 2 and 3** (see policy SC3 map, Figure 5.1) are defined through Planning Practice Guidance, at paragraph 065, as follows:
- Zone 2, medium probability; land having between a 1-in-100 and 1-in-1,000 annual probability of river flooding, or land having between a 1-in-200 and 1-in-1,000 annual probability of sea flooding.
  - Zone 3a, high probability; land having a 1-in-100 or greater annual probability of river flooding, or land having a 1-in-200 or greater annual probability of sea flooding.
  - Zone 3b, the functional flood-plain; land where water has to flow or be stored in times of flood (not separately distinguished from Zone 3a on the Environment Agency's Flood Map).
- 2.29 In these areas, flood risk is already clearly a significant issue requiring design mitigation and risk management responses.

- 2.30 **Areas of Parks Deficiency** (see policy INF7 maps, Figures 6.5 to 6.8) are derived from mapping of the categories of public open space and catchment areas in accordance with London Plan Table 7.2. Where addresses fall outside catchment areas, they are considered to be in areas of deficiency as per policy INF6. A positive policy response is required by Policy INF7, which states that deficiencies in quantity, quality and access to open space will be addressed, and which identifies quantity (and quality) of District and Local Parks as key priorities.
- 2.32 **Licensing Saturation Policy Zone** (see Figure 3.9 above) is a designation under section 182 of the Licensing Act 2003, whereby applicants for licences for selling alcohol and late night premises licences are required to demonstrate that they will not worsen defined problems: crime and disorder, public safety and nuisance. In planning terms these should be used as informative designations to highlight where there are existing clusters of uses associated with high levels of anti-social behaviour. As such, where application is submitted it must provide sufficient surety that it will not worsen such problems via appropriate management measures, and where necessary, exclusion based on clustering definitions.
- 2.33 **Health & Safety Executive Consultation Zones** (see Figure 3.9 above) are defined around major hazardous installations, and require the Health and Safety Executive to be consulted on development proposals within them where they fall into certain categories<sup>2</sup>, notably, where they involve residential and other uses that would increase the number of people exposed to a potential hazard. In planning terms, this will affect the distribution of such uses and hazard management, with the objective of not worsening existing risk. It should be noted, however, that in some places decommissioning is proposed which would remove these zones; the timeframe within which this occurs may therefore alternatively affect development phasing.
- 2.34 **Airport Public Safety Contour and Zone** (see policy INF1 and INF2 map, Figure 6.1) are defined by the Civil Aviation Authority (CAA) reflecting risk of aviation-related accidents. The stated objective is to reduce or not worsen the number of people exposed to that risk. As such 'there should be no increase in the number of people living, working or congregating in Public Safety Zones, and over time, the numbers should be reduced as circumstances allow' (Circular 1/2010). Therefore, in planning terms, development that would increase the number of people living, working or passing through the zone would not be supported. In assessing this, advice is sought from London City Airport, the CAA and Department for Transport (DfT) where applicable.
- 2.36 **Congestion Zones** (see policy INF1 and INF2 map, Figure 6.1) are the areas in the Borough where traffic congestion is consistently poor throughout the day (delay in traffic greater than 1.5 mins per km). This distribution is derived from a combination of peak morning, inter-peak and peak afternoon congestion data provided by Traffic Master. These are areas where development with traffic impacts should ensure that they are mitigated as far as possible to reduce congestion.

## Implementation

- 2.37 The policy will be applied through the Development Management process through the

application of GIS analysis in the assessment process, drawing on the Council's survey work and associated GIS records, and through the use of appropriate conditions and, or legal agreements. The policies referenced stipulate the expected response to each impact which should be set out in a statement accompanying the application, and secured by conditions or legal agreements as appropriate.

- 2.37a It is also the Council's intention that its published evidence base on these matters helps to indicate the in-principle acceptability (or otherwise) of relevant proposals in particular locations. Monitoring will be carried out via surveys every other year to update this: see Indicators. Other policies to which there is a logical link are highlighted, encouraging responses that deal with the issues in an integrated way.
- 2.38 The policy intention is that the full breadth of cumulative impact issues that affect the borough are acknowledged at every scale of development, the nature of cumulative impact being that impacts large and small together combine to be of greater significance. Early consideration of these matters will be encouraged through pre-application advice/design review and in implementing other consents approaches such as permission in principle, as well as through more proactive regeneration and local implementation plan work.
- 2.39 To support applications, proposals should refer to the supporting documents, relevant updates and if appropriate, specific agencies indicated in the policy.

## Monitoring

- 2.40 The monitoring framework covers many aspects of cumulative impact, including monitoring of environmental nuisance, air and water quality, infrastructure sufficiency and traffic congestion, and indicators relating to relating to town centre health/quality and healthy urban planning. In relation to outputs, of key importance will be ensuring explicit consideration of cumulative impacts where relevant, in the officer's decision, and as such policy usage monitoring and associated output measures will be of particular relevance. These are furnished through consents monitoring and town and local centre survey work which updates GIS databases. There is scope within these to further scrutinise betting shop and nightly-stay hostels consents. Outcome indicators of particular relevance will be satisfaction with the area, environmental nuisance levels, and mortality and obesity statistics. Decisions and appeals monitoring also supports assessment of policy relevance and effectiveness.

### 2.40a Indicators

- i. SP-OP2 Healthy Urban Planning:
  - a) Number of new takeaways permitted [no specific target: monitor for evidence of downward trend or sustained low levels];
- ii. SP-OP8 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];

- iii. SP-OP9 Cumulative Impact:
  - a. Number of Betting shop approvals [no specific target: monitor for evidence of downward trend or sustained low levels];
  - b. Nightly stay hostels approved [no specific target: monitor for evidence of downward trend or sustained low levels];
- iv. SP-OUT1 Successful Place-making and Design:
  - a. Crime and fear of crime [no specific target, should be improving];
  - b. Satisfaction with the area [Maintain above 75%, should be improving];
- v. SP-Out-2 Healthy Urban Planning:
  - a. Mortality rate [achieve convergence with London average, should be improving];
  - b. Rates of physical activity, childhood obesity and mortality linked to circulatory diseases [no specific target, should be improving];
  - c. Air Quality Exceedances [as per Air Quality Management Plan];
  - d. Resident perceptions in the annual Newham Survey [no specific target, should be improving];
- vi. SP-OUT4 Town Centre Health:
  - a. Monitor vacancy Levels and non-retail uses in primary frontages in town centres [no specific target, should be holding steady or improving];
  - b. Monitor historic buildings at risk within defined town centres [Entries for Newham should decline annually];
  - c.
    - i. Monitor quality Leisure: Proportion of leisure uses in town centres that are betting shops, amusement arcades and hot food takeaways [no specific target, should be holding steady or improving];
    - ii. Distribution of takeaways, betting shops and hostels [no specific targets but there is an expectation that overconcentration of these identified uses will reduce over time];
  - d. Resident perceptions of town centres in yearly Newham Survey [no specific target, should be holding steady or improving];
  - e. London Town Centre Health Check, Newham Town Centre and Retail Study and other relevant studies [no specific target, should be holding steady or

improving]; all to be monitored against London average where possible; otherwise monitor for appropriate trends in line with IIA objectives.

# J1 Business and Jobs Growth

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

## 1. Strategic Principles:

- a. Realise the benefits of the borough's connectivity, international profile and existing and emerging sectoral strengths to secure a supply of land, infrastructure, premises and successful places capable of attracting investment in growth sectors and supporting the existing business base, facilitating the continued diversification of the borough economy and supporting Convergence aims; and
- b. Promote employment, industry and logistics as important components of sustainable, mixed use places, whilst recognising the need for this to be strategically managed to ensure premises and places balance the needs of business, visitors, the economy, the environment and Newham's communities, meet evidenced demand, benefit from Agent of Change principles, and as per J2, make efficient use of land.

## 2. Spatial Strategy:

- a. Continued development and promotion of the Arc of Opportunity and employment hubs as (amongst other things), high quality business environments with a diversity of flexible, future-proofed premises with particular strengths as set out in Table J.A;
- b. Focusing visitor attractions, and facilities on Strategic Sites in the Royals Docks and S08, LCY airport and ExCel employment hubs, Stratford Metropolitan and Green Street town centres; and quality visitor accommodation in town centres proportionate to their function and character, together with the Royal Docks Strategic Sites and S08, S31 and ExCel/Royal Victoria West Employment Hubs;
- c. Major office development (Use Class B1(a)) will be directed to Stratford, in accordance with Policy S2, smaller-scale office development will be encouraged in the other Town Centres, LMUAs and MBOAs and on appropriate mixed use Strategic Sites;
- d. Major industrial development will be directed to and where appropriate intensified (including support for displaced businesses) at Strategic Industrial Locations and Local Industrial Locations (as per Policy J2 and designated in Table J.b);
- e. New town centre - including night-time and evening economy - uses will be directed within the defined hierarchy to a centre, including emergent centres on Strategic Sites, proportionate to its scale, unless related to the visitor economy (as per 2b above), clearly ancillary to other uses, and the NPPF sequential test is met (as per INF5 and SP6); and
- f. Small-scale start-up and/or cultural and creative workspace will be directed to town centres, notably Stratford Metropolitan, East Ham, Forest Gate and Green Street, LMUAs and MBOAs, and where appropriate CFOAs (as defined in J2 & INF8) or masterplanned as part of mixed use Strategic Sites, notably at North Woolwich Gateway.

### 3. Design and Technical Criteria:

- a. New employment-generating development should demonstrate, especially when outside of LILs and SILs, that it can exist in close proximity to housing with minimal amenity impact as per SP8;
- b. New housing must demonstrate neighbourliness, in respect of existing and potential employment uses LILs, SILs, and existing employment uses in employment hubs or otherwise expected to prevail, taking on responsibility for protecting those uses from the possibility of future complaint due to the proximity of new residential neighbours;
- c. Require new out of centre town centre uses of more than 300 sq m net to demonstrate that they do not result in unacceptable impacts as per INF5:3a;
- d. New night-time economy uses must demonstrate that they promote a safe and high quality environment for all, cognisant of cumulative impacts set out in Policy SP9; and
- e. Require all Strategic Site proposals and Major developments incorporating employment floorspace in employment hubs and/or on SIL, LIL, and LMUAs set out in J2, to address Convergence objectives through an Employment Strategy that details:
  - i. phasing of new permanent employment-generating floorspace in such a way that maximises the likelihood of beneficial use considering deployment of temporary uses where appropriate;
  - ii. marketing / demand testing and occupier commitments in relation to the proposed mix of unit type, scale and tenure, recognising the identified shortages and surpluses identified by the Newham ELR Part 2 and subsequent updates ; and
  - iii. commitments to work with the Council's Workplace organisation to maximise local employment opportunities, including appropriate lead-in times in relation to training provision.

Table J.A: Employment Hubs

Employment Hub	Strength/Focus
E5 Stratford Metropolitan	Town centre uses including visitor economy, evening and night-time economy, creative and cultural industries, further and higher education and associated supply chain; CAZ reserve for offices (especially public sector)
E8 Canning Town (town centre vicinity)	Town centre uses including leisure, evening and night-time economy and associated supply chain
E9 ExCel/Royal Victoria West	Visitor economy, business and conference
E11 London City Airport	Visitor economy, business and logistics
E10 Royal Albert North	Visitor economy, higher education and spin offs, Council head office
E12 Newham University Hospital	Health and education
E6 Green Street	Town centre uses, creative and cultural industries, visitor



	economy
E7 East Ham	Town centre uses including leisure, evening and night-time economy, creative and cultural industries, civic centre,
E3 Thameside East	B Class Uses (SIL), particularly food manufacture, high technology, cultural and creative and green industries
E1 Beckton	B Class Uses (SIL) especially distribution and logistics, plus engineering (transport depot) and utilities and waste/green industries. Retail and associated supply chain
E4 Cody Road/Prologis	B Class Uses (SIL) especially distribution and logistics, engineering and green industries
E2 Thameside West	B Class Uses (SIL), particularly high technology manufacturing, wharf related uses, cultural and creative, construction and green industries
E13 Albert Island	B class uses (LIL) including marine engineering, high technology and warehousing and construction training
E14 Forest Gate	Town centre uses and supply chain, cultural and creative industries
E15 East Beckton	Town centre uses and community facilities

Employment hubs are defined on the Policies Map and on the map below. For associated Strategic Sites see spatial policies S2-6 and Appendix 1.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Spatial Strategy.

## Justification

- 6.78 It is expected that more jobs will be created in Newham a borough that has seen increases by a third in the numbers of economically active residents since 2010 . It is estimated that during the plan period 39,000-60,000 could be created in Newham which is the highest of all neighbouring boroughs with the exception of Tower Hamlets.
- 6.79 In order to help maximise growth potential and promote sustainable and quality employment that addresses the successful mixed use place, convergence and resilience agendas, the policy seeks to attract and retain investment from growth sectors such as culture, creative and visitor and evening economy, education and knowledge led economy, hi-tech manufacturing, warehousing and logistics, construction and green enterprise, business and business services building on Newham's strong platform for economic growth. In doing so, the policy aims to capitalise on its excellent connectivity including with The City, Stratford, Canary Wharf and the West End and beyond, and providing for associated land, premises (including storage/yard space) and infrastructure requirements, (including digital, energy, transport, work and social spaces).
- 6.79a Ensuring that the supply of suitable employment land and premises is appropriately protected and newly provided for to meet emerging growth sectors will be a key

Figure 4.1 - Policy J1: Employment Hubs



component in maximising Newham's economic strength and future investment, recognising that in the competition for land, this needs to be evidence led, related to growth needs and not entirely speculative, and to work to achieve efficient use of land without undermining functionality. In this respect for instance, it is noted that independent budget hotel market provision is extensive relative to more luxury and quality assured (more than 2\*) premises. Likewise, the Employment Land Review (ELR) Demand Assessment<sup>1</sup> demonstrates that major office floorspace is more than well provided for within the pipeline, and at present is unlikely to be justifiable elsewhere in terms of likely beneficial occupation, though there is a gap in the market for smaller scale, more locally oriented offices. Similarly, whilst there is growth in the cultural and creative sector, and significant displacement pressures from increasingly expensive inner boroughs, its presence in Newham will need to be carefully curated rather than provided purely on the basis that 'if we build it they will come'.

- 6.79b In supporting the broad range of employment opportunities, the policy seeks to create high quality business environments that are supported by appropriate associated infrastructure (including digital, energy, social infrastructure and facilities) and delivered to meet the needs and requirements of existing and future businesses and its users. Promotion of diverse and flexible workspace allows response to changing business needs and create robust, future proofed places, including successful Town Centres and the promotion of local supply chain and local employment links; indeed, particular need has been identified for micro, social, small and medium enterprises, as well as larger ones, and a variety of ownership lease and licence terms and prices<sup>2</sup>
- 6.80 Although overall the Council will be seeking a broad range of employment opportunities in certain types of employment are considered to be more appropriate or likely to succeed in particular areas such as larger evening/night time uses within Major or Metropolitan town centres, visitor accommodation in town centres or in employment hubs with particular visitor economy roles, cultural and creative in MBOAs and LMUAs, and major Office development in Stratford. This builds on locational advantages including agglomeration effects related to key use clusters, compatibility with the wider area, and the provision of appropriate infrastructure, such as the capacity of the transport network. Recognising significant areas of existing employment and identifying their future potential, the Council has therefore designated a number of Employment Hubs. These are mostly in the Arc of Opportunity, but also relate to other key employers and employment areas in Urban Newham, notably the Town Centres. In these, suitable employment uses will be encouraged, and in some cases protected where appropriate looking to reinforce their success by new development at key sites just beyond them as well as within the hubs themselves. Superimposed on this are a number of sector-specific strategies, relating to other policies in the plan, (notably public transport accessibility (INF2) and particular opportunity areas identified in spatial policies) national and London-wide policies.
- 6.80a Although the majority of employment will be directed to these areas, other locations are likely to be suitable for smaller-scale development, for example in Strategic Sites identified for mixed uses as detailed in Policies S1-6 and other small-scale designations including LMUAs for cultural/creative workspaces and LILs recognising local clusters of

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<sup>1</sup> [Newham Employment Land Review Part 2: Demand Assessment \(2017\)](#)

<sup>2</sup> [Newham Employment Land Review Part 2: Demand Assessment \(2017\)](#)



industry as identified in policy J2 (and Table J.B).

- 6.80b In overall creating a mixed used area, it is important that new uses contribute to neighbourliness, as per SP8 to overall create successful places, generally working on the basis of 'Agent of Change' principles. Depending on the area, there will be different emphases as to which uses have to be compatible with which, seeking to appropriately buffer core SIL and LIL and night time economy clusters, but also key residential areas, whilst generally recognising new employment floorspace design is much more compatible with residential than some existing floorpace, and in some areas cumulative impacts need to be managed as per SP9. Similarly, in some cases, out of centre town centre uses as set out in more detail in policies INF5 ensuring impacts on town centres, through demonstrating need will need to be addressed.
- 6.81 Lastly, the policy specifies in more detail how in relation to proposed employment-generating aspects developments on Strategic Sites or other strategically significant locations (as specified) should better address the strategic objective of generating a step change in residents' social and economic well-being, to bring it more in line with the rest of London. Whilst it is the nature of many of these sites that development times may be long, and floorspace to some extent speculative, there are various ways in which such sites can be made to work harder, with greater certainty of delivery in terms of this objective.

## Implementation

- 6.82 The Council will continue to work together with local businesses and business groups to support Newham's economic growth and develop the tourism and leisure offer, cultural uses, and the evening/night-time economy, and generally develop and improve the business environment of Town Centres.
- 6.83 The Council will continue to take a proactive development management role working with partner organisations (including developers) to grow the business, modern industrial, digital and creative sectors by offering high quality employment environments and support for employment generation and education and training opportunities.
- 6.84 Developers will be expected to address the criteria in this policy in scheme formulation and accompanying planning statements, including a specific, robustly evidenced Employment Strategy where indicated. To ensure business requirements are met it will be expected that marketing and demand testing will be demonstrated, and consideration given accordingly to market appropriate physical forms and supporting facilities, types of management and tenure, (including short term licensing options, managed and affordable workspace) together with appropriate meanwhile use, marketing and phasing strategies. Likewise, as per J3, a commitment to work with the Council's well established employment intermediary will be expected. The Council will work with applicants through established pre-application advice channels to advise on the acceptability of approaches to satisfy these requirements.
- 6.84a Resultant commitments and Agent of Change principles will be secured by appropriate conditions and legal agreements. In order for employment-generating uses to benefit from neighbourliness and Agent of Change, presumptions however, they should be acting reasonably and lawfully within the existing consents and permissions. Equally, where new employment-generating development occurs, the assumption is that the opportunity

should be taken through masterplanning, modern design, supply chain specification (e.g. re delivery modes) and engineering techniques to also optimise neighbourliness and minimise off-site spatial impacts (noise, odour, vibration etc.) as per SP8, albeit acknowledging that some uses present more opportunities to do so than others.

- 6.84a.i In responding to the criterion concerned with balancing, inter alia economic needs and those of the environment, it will be expected that policies SC1-5, SP5, INF9, INF6&7 and INF2 will be particularly relevant noting the need to consider off-site indirect and in-combination effects, particularly in relation to traffic movements and resultant air/water quality impacts, as well as those on site.

## Monitoring

- 6.84b The monitoring framework includes specific performance indicators relating to strategic business and jobs growth upon which the relevance and efficacy of Policy J1 will be assessed. Outputs are monitored through in-house monitoring of consents, (partly recorded in the London Development Database (LDD) and GIS analysis together with analysis of decision-making. Outcomes draw on national statistics available annually, though those linked to J3 will also be relevant. Continued engagement with the business sector, including agents, and via Elected Members, and local residents will also be important feedback mechanisms, particularly as regards changing patterns of demand, the appropriateness of the spatial strategy and the efficacy of agent of change/neighbourliness criteria.

### 6.84c Indicators

- i. J-OP1 Business and Jobs Growth:
  - a. Additional Employment Floorspace [No specific target: maintain trend in line with ongoing development of strategic sites];
  - b. Tourism and leisure development [no specific target – monitor ongoing development as per strategic site aspirations];
  - c. Investment in employment hubs [no specific target, but ongoing investment should be evident];
  - d. Small and affordable business space [no specific target, continue to add to provision];
  - e. Small Business Space (<500 sqm) recorded as part of larger schemes [no specific target, continue to add to provision];
  - f. Affordable workspace/local business occupancy provision [no specific target, continue to add to provision];
- ii. J-OP4 Policy Use and Robustness [no specific target; should be using regularly if effective, and support at appeal the majority of the times use];

- iii. J-OUT1- Economic Development - Business Domain:
  - a. Business by sector [Target: should be steady or growing];
  - b. New business formation and survival [Target: should be steady or growing].

## J2 Providing for Efficient Use of Employment Land

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles

- a. Achieve [more] efficient use of employment land to support economic growth sectors and wider growth needs through the retention of suitable locations and capacity, intensification with no net loss of functionality, and limited, plan-led managed release of land as set out spatially in Map J; and
- b. Manage the positive and negative impacts of employment-generating uses to ensure a managed transition to successful mixed use places at the large and small scale, helping to secure a balanced mix of jobs and homes.

### 2. Spatial Strategy

- a. Strategic Industrial Locations (SIL) and Local Industrial Locations (LIL) as listed in Table J.b are designated for protection, Managed Intensification (as per criteria in J2.3b) and as suitable in principle for Use Classes B1(b) B1(c) B2, B8, appropriate sui generis employment uses including waste, utilities and transport depots, with other supporting facilities including B1a uses, where ancillary in scale and function. Sites with notable development capacities are identified in the spatial policies and Strategic Site Allocations at Central Thameside West, North Woolwich Gateway and Silvertown Landing;
- b. The following sites will be released from SIL protection subject to Managed Release criteria (at J2.:3a) and where proposals are in line with the vision set out in the spatial and other successful place-making policies including the relevant site allocation:
  1. Silvertown Landing (Thameside West) (part);
  2. Lyle park West (Thameside West);
  3. Connaught Riverside (Thameside East) (part);
  4. Beckton Riverside (part);
  5. Thames Wharf; and
  6. Minoco Wharf;

There is also scope for some limited further release through intensification of SIL uses over a smaller land area or with reduced spatial impact on the sites at Canning Town Riverside, Beckton Riverside and Silvertown Landing, where compliant with Managed Intensification criteria (see J2:3b) and spatial policies including the relevant site allocation;

- c. Local Mixed Use Area (LMUAs) identified in Table J.b are allocated for employment-led mixed use that:
  - i. protects and promotes Class B1 uses and other employment-generating uses compatible with residential, subject to town centre and other infrastructure policies; and/or
  - ii. allows for Managed Transition (see J2.3a) and redevelopment to focus on the ongoing viable operation of such uses and design incorporating or compatible with residential uses, whilst addressing any other site-specific issues;
- d. Within Micro Businesses Opportunity Areas (MBOAs) identified in Table J.b allowing employment floor space that accommodates no more than 10 employees (cognisant of typical employment densities) subject to other policy considerations notably SP2, SP3, SP8 and SP7;
- e. Allowing small-scale (less than 100 sq m GEA) B Class or Sui Generis non-speculative employment floorspace outside of defined employment areas to meet local business needs, and subject to other policy considerations, notably policies SP2 and SP8;
- f. Elsewhere/in other cases, subject to compliance with Managed Release criteria (see J2.3a) on sites of 0.1ha or more, or where operational employment-generating floorspace comprises of 1,000 sq m or more, promoting consolidation of all other B class and sui generis employment-generating uses into:
  - i. SIL, LIL, LMUAs and MBOAs as per the above spatial strategy; or, in order to relieve pressure on core SIL/LIL areas;
  - ii. Strategic Sites providing other suitable new employment-floorspace; and
  - iii. Where compatible, onto otherwise undesignated/allocated out of town retail parks; and
- g. The Council will support the consolidation of four of the safeguarded wharves in Thameside West onto Central Thameside West in line with Policy INF1 and S3 to promote a more effective use of employment land subject to compliance with the Managed Intensification Criteria, and of the release of 2 wharves in the Canning Town Riverside area and adjacent (Mayer Parry and Priors Wharf) as per relevant London Plan Policies.

These locations are defined in the Policies Map and in Table J.B.

### 3. Design and Technical Criteria

- a. Require applicants on sites (including Strategic Sites) covered by Managed Release and Managed Transition specifications to:
  - i. Have in place a strategy to deal with the relocation requirements of existing businesses that cannot be incorporated within a redevelopment no matter the



extent of their lease interest, making reasonable endeavours to ensure they have a suitable alternative site secured, including transitional arrangements, cognisant of their local and regional economic role;

- ii. Where release to solely residential use (outside of Strategic Sites) is proposed, demonstrate marketing at locally benchmarked [industrial] prices/rents through local agents for a period of at least 12 months for the full range of permitted uses, including the option for sub-division and mixed use development incorporating the viable employment uses;
  - iii. Ensure neighbourly development is achieved (in line with policy SP8) and not jeopardising the functioning of any remaining employment uses, including those incorporated within the redevelopment; and
  - iv. Demonstrate that new employment floorspace within the redevelopment is designed to respond to evidenced market demand and occupier requirements to secure viable occupation.
- b. Require proposals on sites covered by Managed Intensification specifications to demonstrate:
- i. genuine intensification that maintains or increases capacity of the relevant SIL or LIL land use and achieves a reduced spatial footprint or spatial impacts; and
  - ii. no net loss of functionality, including ability to meet evidenced local and appropriate strategic industrial and warehousing qualitative and quantitative demand.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles; 2.Spatial Strategy paragraphs a, b, c, f and g only.

Table J.B: Employment Land Table

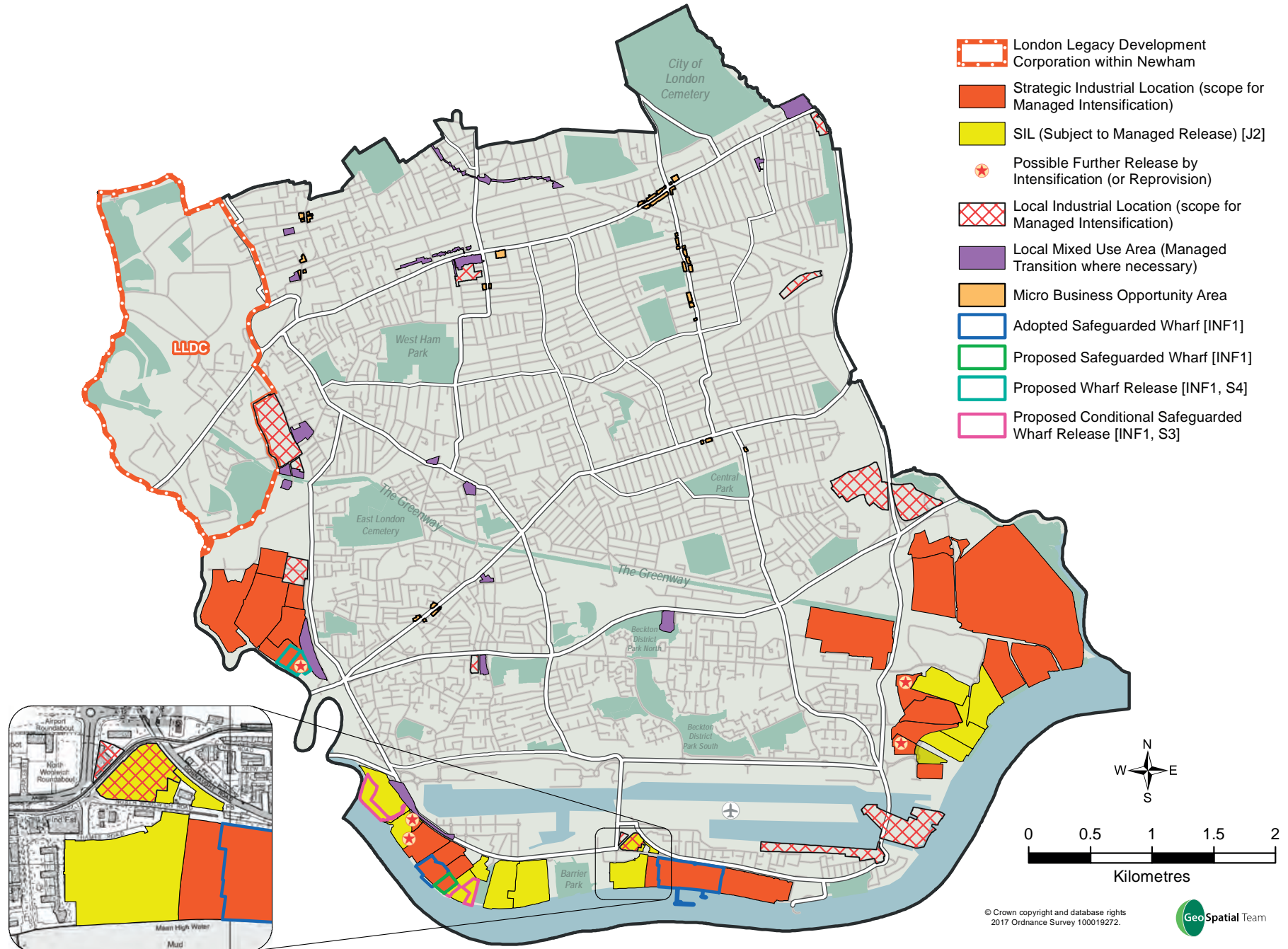
Site Reference	Site	Function
SIL 1: LIndP	London Industrial Park	SIL
SIL 2: Cody Rd	British Gas/Cody Road	SIL
SIL 3: Tside W	Thameside West	SIL
SIL 4: Tside E	Thameside East	SIL
SIL 5: Beckton	Beckton Riverside	SIL
LIL 1	Stephenson Street	LIL (Logistics and Transport)
LIL 2	Jubilee Line Depot	LIL (Logistics and Transport)
LIL 3	East Ham Depot	LIL (Logistics and Transport)
LIL 5	Land East of City Airport	LIL (Logistics and Transport)
LIL 6	Folkestone Road Depot	LIL (Logistics and Transport)
LIL 7	Beckton Gateway	LIL (B Class Uses and other Industrial Type Uses)

LIL 8	Canning Road East	LIL (B Class Uses and other Industrial Type Uses)
LIL 9	Nursery Lane	LIL (B Class Uses and other Industrial Type Uses)
LIL 10	Grantham Road	LIL (B Class Uses and other Industrial Type Uses)
LIL 11	St Mark's Industrial Estate	LIL (B Class Uses and other Industrial Type Uses)
LIL 12	Albert Island	LIL (B Class Uses and other Industrial Type Uses)
LIL 13	Butchers Road	LIL (B Class Uses and other Industrial Type Uses)
LMUA 1	Silvertown Arches	Employment-led mixed use (see J2.2.c)
LMUA 2	Aldersbrook	Employment-led mixed use (see J2.2.c)
LMUA 3	Nursery Lane	Employment-led mixed use (see J2.2.c)
LMUA 4	East Ham Industrial Estate	Employment-led mixed use (see J2.2.c)
LMUA 5	Forest Gate Arches	Employment-led mixed use (see J2.2.c)
LMUA 6	Ashburton Terrace	Employment-led mixed use (see J2.2.c)
LMUA 7	Dulcia Mills	Employment-led mixed use (see J2.2.c)
LMUA 8	Sprowston and Atherton Mews	Employment-led mixed use (see J2.2.c)
LMUA 9	Canning Road West	Employment-led mixed use (see J2.2.c)
LMUA 10	Grove Crescent	Employment-led mixed use (see J2.2.c)
LMUA 11	St Marys Industrial Estate	Employment-led mixed use (see J2.2.c)
LMUA 12	Bidder Street	Employment-led mixed use (see J2.2.c)
LMUA 13	Bridge Road Depot	Employment-led mixed use (see J2.2.c)
LMUA 14	Beeby Road	Employment-led mixed use (see J2.2.c)
LMUA 15	Esk Road	Employment-led mixed use (see J2.2.c)
LMUA 16	Kudhail Industrial Complex	Employment-led mixed use (see J2.2.c)
MBOA 1	Canning Town	Policy ref J2.2.d
MBOA 2	East Ham	Policy ref J2.2.d
MBOA 3	Forest Gate	Policy ref J2.2.d
MBOA 4	Manor Park	Policy ref J2.2.d
MBOA 5	Stratford	Policy ref J2.2.d

## Justification

- 6.86 The Council is required by national and regional policy to plan positively to meet the area's development needs and support sustainable economic growth, including support for existing and new employment sectors, whilst not protecting land that has no reasonable prospect of use. This policy seeks to ensure the supply of land to support economic and other growth needs, i.e. including as well as industrial and other employment, housing, social and green infrastructure, waste, transport and utilities, recognising their interrelationships, for instance, that housing growth generates warehousing and logistics needs, and employment growth generates housing need. In doing so it seeks to optimise opportunities for economic growth in a way that supports a strong local economy (and therefore resilience and convergence) and wider strategic needs, and promotes a quality of place, through a spatial strategy and reservoir of employment land that provides for different types of employment space, with varying locational requirements and compatibility with other uses, and managed, plan-led land use change.

Figure 4.2 - Policy J2: Employment Land & Related Designations



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GeoSpatial Team

- 6.86a Newham is a strategically important industrial location for London. It has the balance of infrastructure to enable businesses to adequately service the CAZ with staff able to easily travel by public transport (and to be enhanced through the delivery of Crossrail). In order to assess employment land needs across the borough, the Council have completed an Employment Land Review (ELR). The Review sought to qualitatively audit the existing employment land alongside a commissioned study to objectively assess future demand for employment space over the plan period .
- 6.87 The Review concludes that industrial development is viable throughout the borough but there is strong demand for industrial space (including 'last mile' uses) across the Borough which is currently not being met. The ELR identifies that the Borough has a demand for at least 26 ha of industrial and warehousing land, (16 ha for warehousing / logistics including depot uses land and 9 ha for industry including waste) with further requirements derived from displacement from its Strategic Sites and those in inner London, notably Tower Hamlets, and that it has a reservoir of 42.52 ha to meet such need over the plan period, allowing for limited, Managed Release and consolidation of wharves, notably on some Strategic Sites, which are crucial to delivering the Council's Spatial Vision (see spatial policies).
- 6.87a Whilst some of this land, and other land formerly in employment use is vacant, only that specifically identified is seen to be 'surplus' to requirements, and even this will result in some displacement which will need to be re-accommodated in order to meet needs in the round, and ensure for a net increase in employment. Likewise, some employment land is seen to be in relatively low intensity use, but this should not necessarily be regarded as 'underused', at least spatially, as in many cases this relates to operational requirements (e.g. yard space for large vehicles), though in some cases there may be scope to intensify its use temporally by introducing further shifts or other uses at certain times of the day (e.g. coach parking).
- 6.87b Moreover, given the influence of 'hope value' for residential development and ongoing displacement issues (including the use of insecure, short term leases), 'forward protection' (of presently vacant sites, or sites otherwise with capacity) to meet demand is set out. This goes hand in hand with proposed release/transition and the provision of support to affected businesses no matter the extent of their lease, but also acknowledgement of the need for consolidation of industrial uses outside of residential areas to enhance residential environments, given that it is often such small scale uses (e.g. vehicle repair workshops) that lead to most complaints as they have not had appropriate compatibility with residential designed in.
- 6.87c Therefore, the different employment designations all work together. For instance, some LILs (e.g. Beckton Gateway, Albert Island, Grantham Road) and Strategic Sites with retained SIL designations (notably Silvertown Landing, Central Thameside West, North Woolwich Gateway) provide particular capacity to accommodate displaced and consolidated heavier industrial uses. Similarly, new workspace on other [parts of] Strategic Sites (notably Alpine Way, Connaught Riverside, North Woolwich Gateway, Lyle Park West) together with LMUAs, offer the opportunity to alleviate pressure and land demands on core industrial land, from uses or configurations of space that are more compatible with residential and help secure other benefits of a mixed use typology. It is also acknowledged that otherwise unallocated out of town retail parks in Beckton also offer some capacity of type,

particularly where uses (e.g. car hire, open storage) may be more compatible with retail servicing and car parking. In turn, MBOAs, LMUAs and Strategic Sites present opportunities to develop smaller scale workspace (such as incubators, accelerators and co-working spaces) to accommodate the borough's buoyant levels of start ups or other businesses for whom affordability is an issue, and in residential areas, some very small scale workspace to support existing business needs may be acceptable.

6.89a However, the demand for remaining stock of land will remain acute, with landowners seeking to manage their landholdings in ways that enable them to quickly realise the higher values for their land that redevelopment incorporating residential or particular types of higher grade/higher density employment uses that command greater rents could bring. This has put particular pressure on space extensive uses such as open storage, and more affordable workspace. As with London as a whole, the plan-led Managed Release, Managed Transition and Managed Intensification approach is therefore vital to ensure that the Borough carefully manages its remaining stock and opportunity sites and overall transition to a mixed use borough to best effect. With pressure on Newham's industrial land, new development will be expected to demonstrate that employment-generating capacity consistent with the designation/spatial strategy has been maximised, not least through the provision of market relevant space, and that changes do not result in loss of functionality.

## Implementation

6.93 Policy will be implemented through the Development Management process and developers will be expected to address the criteria in this policy in scheme formulation and accompanying planning statements, Employment Strategies (where required) providing robust evidence where necessary, (e.g. marketing of the site/scheme).

6.93a The employment land designations (including acceptable land uses on these) are set out in Table J.b and the Policies Map. The Employment Land Map sets out the locations across the borough whereby the release of SIL will be allowed, subject to the Managed Release criteria and other policies.

6.93b Managed Release and Transition is a plan-led process that should occur in identified places or circumstances (in the case of the threshold referred to at 2.f). The starting point is an understanding of what presently exists on site, its economic role (for instance in servicing other economic activity providing for strategic infrastructure such as waste management capacity, as well as the quantum of floorspace and its uniqueness and/or contribution to a wider cluster) and associated locational requirements, which will in many cases require continued access to the local market. As such reasonable endeavours will require proposals to demonstrate positive and proactive engagement with existing occupiers and relocation support arrangements offered that have regard to known potential impacts on business supply chains, operational continuity and continued access to labour that have been put in place in a timely manner to ensure that disruption to existing businesses are minimised. This is likely to involve support with site search and consideration of re-accommodation within the site or other sites within the landowner's control locally. Re-provision within the site is provided for in specification of various employment areas in mixed use Strategic Sites as retained SIL or SIL buffers where appropriate; it is also anticipated that it has a role in planning for flood risk management with employment uses, providing less vulnerable

active ground floors in vertical mixed use. Release is therefore conditional on these needs being met, no matter the extent of the lease interest of the affected parties.

- 6.93b.i In the case of proposed full release to residential (outside of Strategic Sites), release requires robust marketing as per the technical criteria. That is in relation to smaller windfall sites in lawful employment use (not SIL Release which is linked to Strategic Site allocations and already accounted for in demand and capacity testing). The policy requires a twelve-month period for demand testing to promote redevelopment of underused employment sites whilst helping to identify those that have reasonable employment potential. As per the GLA Land for Industry and Transport SPG, the policy ensures that the site has been adequately marketed through commercial agents at a price that reflects market value for industrial use for a reasonable period and offered with potential for redevelopment where this is required to meet the need of modern industrial users.
- 6.93.b.ii In turn, on sites where employment uses are to continue to feature, as per J1, provision should be subject to market and demand testing, including reference to the ELR Demand Side Study and subsequent updates.
- 6.93.b.iii In requiring release site to achieve Neighbourly Development (as per SP8) the assumption would be that uses to benefit from Agent of Change would be operating reasonably and lawfully over time if they in turn propose further development, that this should reflect the potential of modern design and supply chain specification to improve environmental performance and neighbourliness. It is however recognised that some industrial (including modernised) processes are inherently less neighbourly than others, and that one of the reasons for continuing to designate land as SIL is to concentrate these uses to better manage their impacts on overall development capacity.
- 6.93.b.iv In relation to wharves, there are two components of the wharf strategy (policy INF1 and S3/S4). The first seeks the consolidation of four safeguarded wharves in Thameside West (Thames, Sunshine, Manhattan and Peruvian Wharves) on Central Thameside West (Peruvian and Royal Primrose Wharves) through Managed Intensification criteria (and appropriate development of associated Strategic Sites) requiring rationalisation and reduction of spatial impacts without net loss of capacity and functionality. This works with the Managed Release of associated SIL to ensure operational continuity for active wharf users. The second is the release of the two wharves at Canning Town Riverside (Mayer Parry and Priors Wharf) due to surplus capacity in the NE region. The Council will work with its partners including the PLA and GLA to realise this strategy and secure compliance with relevant London Plan policies.
- 6.93c Managed Intensification, is promoted in Canning Town Riverside Silvertown Landing and Beckton Riverside as specified in the site allocations with a view to enabling further release of co-location, should criteria (as per J2:3b) be met. Elsewhere (on SIL and LIL more generally) the objective will be to increase capacity for further SIL and LIL compatible uses (without incursion of residential). In all cases it requires careful attention to the need of SIL and LIL uses on site, and how they could be intensified without compromising their operational functionality and overall capacity expectations on sites relating to modelled demand for industrial and warehousing uses (including transport, utilities and waste management) as set out in the Employment Land Review Part 2 (and any subsequent updates) and monitoring updates.

- 6.93.c.i Such intensification may be achieved over several sites that better meet needs than one site and allow for rationalisation of space perhaps by including a non-traditional employment site (such as an otherwise unallocated out of centre retail park). Another possibility is temporal intensification, making use of 'down time' on other sites. Spatially it will also include actions such as enclosure of external storage, reducing off site impacts. Functionality considerations will include continued provision of adequate yard space, road access, ability to accommodate working patterns, wider ability to accommodate projected industrial/warehousing demand, (including a measure of cross-boundary displacement) in some cases due to impacts on adjacent SIL/LIL (e.g. due to potential access routes through the subject site)
- 6.93d MBOAs are areas of search for micro-business and as such, scale of proposals should reflect definitions of a micro-business and typical employment densities defined by the HCA or successor work. Their operation is intended to complement town centre and Key Corridor policies, recognising that in some locations consolidation of all commercial uses into town centres is challenging, and active ground floor uses and design/quality improvements may be beneficial to the wider street. In doing so, uses should not be of a scale that would cause town centre impacts and should be non-speculative, to avoid the potential for problematic ground floor voids as per SP3.
- 6.93d.i Employment-led development is defined on the basis that employment needs (including the viable operation of employment generating uses on the site and where relevant, adjacent sites) should be met first in any design, and then other uses such as residential are fitted around it. This will involve a design and market engagement exercise that establishes the optimum quantum and format of employment space (or in some cases supporting utilities infrastructure) that the site can sustain and further design to ensure that other elements of the proposal do not prejudice the viable operation of such uses on the site and where relevant, adjacent sites, but also designing in compatibility with residential and quality place-making. This process should be in conjunction with response to Managed Transition criteria where appropriate.
- 6.93e In respect of the commentary above, it is worth noting that in some cases B2 and B8 uses and similar Sui Generis Uses will be enabled to prevail on LMUAs through design strategies that better secure their compatibility with residential e.g. enclosure, and higher insulation standards in any residential introduced on site. In some cases, this kind of process may simply be the start of a longer term process of transition compared to elsewhere.
- 6.93f In order to support existing businesses, this policy also provides for the small-scale intensification of B Class and Sui Generis employment-generating floorspace outside of the employment land hierarchy, and scope for small-scale walk-to facilities to meet the needs of people working within industrial areas. The provision of such facilities should be in line with town centre and community facilities policies (INF5, INF8) which prioritise town and local centre locations for such uses but allow for small scale local provision where other access is lacking (i.e. within 400-800m, a 5-10 minute walk). Office space should be clearly ancillary to main industrial uses on a LIL, clearly linked to the employment functions in the case of childcare and training facilities, and whilst the scale is a matter of fact and degree, in line with SIL, this means that B1a floorspace should not be large-scale, predominate or compromise the wider industrial offer and preferably be necessary to its functioning.



## Monitoring

6.93g The monitoring framework includes specific performance indicators relating to the use and release of employment land upon which the relevance and efficacy of Policy J2 will be assessed and monitoring is a vital component of managed release. Outputs and outcomes, will be drawn from London Development Database (annual) and regular, timely (at least every 2 years) employment land surveys (e.g. Employment Land Review, GIS). Wider outcome indicators specified in J1, J3 and S1 will also be relevant. Engagement with local businesses, wider users of employment land and local residents and elected members will also provide important feedback on the efficacy of the policy. J1 will be kept under review and monitored against the indicators set out below and published in the LBN Jobs Authority Monitoring Report/Bulletins.

### 6.93h Indicators

- i. J-OP2 Securing Effective Use of Employment Land:
  - a. Employment Land Available [monitor to demonstrate project needs can be accommodated];
  - b. Loss of Employment Land [no loss of land specified for protection];
  - c. Net change in employment floorspace approved and completed on protected Strategic Industrial Location (SILs) and Local Industrial Locations (LILs) [no specific target, should be increasing];
  - d. Employment land improvements [no specific target, monitor for change secured through planning and other interventions];
- ii. J-OP4 Policy Use and Robustness[no specific target; should be using regularly if effective, and support at appeal the majority of the time];
- iii. J-OUT-1 Economic Development - Business Domain:
  - a. Vacancy rates on Employment Land [no specific target, should be steady or reducing relative to London/neighbouring borough averages].



## J3 Skills and Access to Employment

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles:

More Newham residents will share in the increasing wealth associated with the expanding local and London-wide economy through:

- a. Tackling barriers to work, enhancing the employability and long term employment prospects for all Newham residents (regardless of health or disability status), including through improvements to aspirations, skills and educational attainment, childcare and training and access, and support for successful employability projects established by the Council and other partners;
- b. Promotion of local labour agreements and procurement in the construction and operation of new development; and
- c. Support for start up and continued development of small and medium sized and social enterprises.

### 2. Spatial Strategy:

- a. New and expanded education, childcare and training facilities should follow the spatial strategy set out INF8, including allowing ancillary training and/or childcare facilities for employers within employment hubs; and
- b. Development of more, and better quality affordable and flexible local workspaces and supporting infrastructure will be encouraged on Strategic Sites and within employment designations set out in Policy J2.

### 3. Design and Technical Criteria:

- a. Proposals for new employment and training space should demonstrate they are accessible for employees and trainees by a choice of transport modes as per INF2; new or intensified training and childcare provision will additionally need to, to meet the policy tests set out in INF8;
- b. All major developments will be required to help ensure that more Newham residents access work through seeking to secure that they occupy:
  - i. 35% of all construction phase jobs; and
  - ii. 50% of all post construction (end user) phase jobs;

typically through a tariff-based contribution and an Employment Strategy as per Policy J1, cognisant of proposed construction methods and sectoral specialisms and subject to viability;

- c. All major developments should demonstrate an understanding of and commitment to the desirability of supplying the construction and operational needs from within Newham; and
- d. Where post 16-year-old education or training is proposed, it should be demonstrated that the facility directly responds to the Borough's identified growth sectors (set out within policy J1), provides recognised and accredited qualifications, and demonstrates support from links with local employers, including reference to the relevance of the proposed qualifications offer, noting the particular work of NCFE in this area.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles.

### Justification

- 6.95 This policy assists in the implementation of the Council's key objective to build personal and economic capacity and improve the economic resilience of all Newham's residents as a key component of economic growth, sustainable communities and successful places in Newham, helping to improve health and other outcomes including convergence. In doing so, it seeks to harness the benefits of development for as wide a group as possible, spreading them beyond its immediate vicinity.
- 6.96 Newham is the 23<sup>rd</sup> most deprived borough in England, (IMD 2015) and whilst this is an improvement, there are serious employment challenges facing the Borough. Life expectancy amongst residents remains lower than the London average and the 4<sup>th</sup> lowest in London. Unemployment has improved in recent years at 7.4% but remains higher than the London Average, particularly amongst young people. The rate of 16-18 year olds not in education, employment or training remains above the London average<sup>1</sup>, and though skills gaps have improved and educational attainment is improving, Newham has a lower level of qualifications compared to London as a whole, and the third highest level of residents with no qualification at 11%, making it particularly hard for residents to get a job. In turn, though economic activity this has significantly improved largely through the success of the Workplace programme, among residents who work, incomes are on average £6000 less per annum than London as a whole<sup>2</sup>.
- 6.100 The skills gap has improved in Newham, in 2009 21% of establishments surveyed in the Employer Skills Survey reported a skill gap in their current work force, and in 2015 dropped to 11% and is now below the London average at 13%.
- 6.105 The Council and its partners are making significant investments in employability projects. Current projects include: the Council's job brokerage mechanism (currently Workplace),

<sup>1</sup> 3.4% of 16-18 year olds in Newham, compared to 3.1% London average. Source: Nomis Annual Population Survey; for further information on employment challenges faced by young people see EqIA para 4.29

<sup>2</sup> Annual survey of hours and earnings 2015

Education Business Partnership and the ongoing work and investment of a range of education providers including Newham College, Newham Sixth Form College (NewVic), the University of East London and Birkbeck College which will support skill development in a range of sectors for all levels of employment types. The spatial strategy, jobs targets and other required undertakings help to further this work, supporting partners' investment, growth sector needs, and more directly connecting residents and businesses with opportunities, acknowledging how planning may affect variety of barriers to work.

- 6.105a The targets are based on experience of presently informally negotiated figures, and viability testing of a proposed associated tariff to support Workplace's work, which demonstrates that it will need to be applied flexibly so as not to excessively affect viability, particularly on schemes with significant amounts of floorspace. It has also been pointed out, that other circumstances including construction methods may require sensitive application in order to meet S106 legal tests.
- 6.105b Using local businesses supports not only investment in the local economy but increases employability prospects. Newham has a high proportion of local businesses of Small and Medium Enterprises (SME's) with over 93% micro enterprises and over 5% small businesses which may find it difficult to engage with some procurement processes without particular attention to their needs, but could be helped to grow in doing so. In addition, the buoyant entrepreneurial local economy would benefit from being able to access suitable employment land/flexible employment spaces as part of mixed use development.
- 6.106 The majority of clients using training facilities and many workers are reliant upon public transport, although shift working also means for some employment space, car access is also important for at least some of the time. In many cases, as per the strategy set out in INF8, for training this will mean prioritising town centre locations, but there is a need to accept that in some cases it is an operational requirement that they are workplace based or otherwise located in out of centre locations. In these cases, and for workplace provision more generally, access choice, including low cost modes, will be an important part of tackling barriers to work, with engagement evidence highlighting its particular significance for young and lower paid people including apprentices starting out in their career.
- 6.107 Policy J1 has identified the main areas of growth in the local economy, and given competing pressures on the use of land as expressed by Policy INF8, and the objective to better connect people to opportunities arising development, training provision should ~~to~~ directly address any needs arising from these, in addition to the requirements set out in INF8.

## Implementation

- 6.108 The Council will continue to take a proactive development management role consistent with its Resilience Framework working with partner organisations (such as Workplace) to support people's access to jobs and skills through development schemes and other projects. In doing so, it takes an inclusive approach, with targeted specialist employment support for those who are disabled or have health issues via Workplace's Supported Employment Team (SET).
- 6.109 Requirements for contributions from S.106 for jobs and skills training arising from the jobs

targets will be set out in a Planning Obligations and Development Viability Supplementary Planning Documents in line with Policy INF9. The proposed tariff, calculated against predicted job yield (drawing on construction costs and employment density data) and benchmarked cost to place people per job, will be used to fund continued brokerage, training commissioning and employment support work by Workplace. The Council supports proposals that maximise economic opportunities resulting in positive benefits for local employment from both the construction and end user stage. The targets will set out as a starting point for negotiations and considered alongside other scheme specific factors including viability, ensuring employment benefits are maximised from development.

- 6.110 In order that proposed new training provision meets the needs of growth sectors identified in J1, evidence of engagement with relevant local employers, skills gap analysis and appropriate recognised qualifications should be provided. However, generally it is recognised that existing provision, notably at Newham College, addresses much of the need arising locally.

## Monitoring

- 6.110a The monitoring framework includes specific performance indicators relating to skills and employment against which the relevance and efficacy of Policy J3 will be assessed. The outputs will be measured through planning activity monitoring, engagement with Workplace and other infrastructure providers. Outcome monitoring relate to a range of economic statistics which reflect the key objectives of this policy to improve educational attainments, skills and raising aspiration to contribute to eliminating the deprivation gap. In addition, engagement with residents and employers will continue to be important to keep track of barriers to work and workforce related business needs.

### 6.110a Indicators

- i. J-OP3 Enhancing Skills and Access to Work:
  - a. Number of jobs filled by employment mechanisms including Workplace (breakdown per sector) [maintain and increase in line with Council or other targets];
  - b. Business support through planning at the construction phase and end user jobs secured through S106 negotiations [trend commensurate with major development progress];
  - c. Education, Skills and Training contributions secured through S106 Planning Obligations [trend commensurate with major development progress];
  - d. Education and training facility developments completed [deliver in line with Infrastructure delivery plan];
  - e. New childcare provisions facilities completed [target in line with infrastructure needs – annual sufficiency statement];

- ii. J-OP4 Policy Use and Robustness[no specific target; should be using regularly if effective, and support at appeal the majority of the time];
- iii. J-OUT 2 Economic Development – employee domain:
  - a. Economic activity rates in Newham, London and neighbouring Boroughs [target to achieve convergence with London average, trend should be improving];
  - b. Prevalence of earning below London Living Wage/National Minimum Wage [target to achieve convergence with London average, trend should be improving];
  - c. Proportion of working age population qualified to NVQ Level 4 and above [no specific targets, monitor for appropriate trends in line with policy objectives and relative to neighbouring borough and London averages to assess convergence];
  - d. Rate of 16-18 years old not in education, employment or training [no specific targets, monitor for appropriate trends in line with policy objectives and relative to neighbouring borough and London averages to assess convergence];
  - e. Percentage of Children in Low Income families, linked to the prevalence of low income indicator, Community Neighbourhood Breakdown (NHPS) [no specific targets, monitor for appropriate trends in line with policy objectives and relative to neighbouring borough and London averages to assess convergence].

# H1 Building Sustainable Mixed Communities

Proposals that address the following strategic principles, spatial strategy and design, technical and management criteria will be supported:

## 1. Strategic Principles:

- a. Enable, from a range of sources, an net increase of additional quality homes exceeding 43,000 between 2018 and 2033 in general accordance with the 'delivery phases' outlined below;
- b. Ensure quality neighbourhoods are created and secure a step change in residential quality, requiring all developments to provide high levels of design quality and have access to adequate supporting infrastructure and community facilities, in accordance with Policies SP2, SP3, SP8 and H3;
- c. Secure the delivery of a mix and balance of housing types, including a significant increase in family housing to replace that lost to conversion, through requiring 39% of the number of new homes on all sites capable of delivering 10 units or more being 3 bedroom homes for families, subject to the appropriate mix considerations below;
- d. Sites allocated, or with a recent consent for residential or part-residential development, should be developed at least in part for conventional housing; and
- e. Housing densities and site locations should not inhibit the provision of quality family accommodation.

## 2. Spatial Strategy:

- a. The majority of new housing will come forward on Strategic Sites allocated by the spatial policies as per Appendix 1, predicated on plan-led, managed release;
- b. The delivery of non-strategic sites (Table H.A), allocated for either residential or residential-led mixed-use development to assist in the delivery of a mix and balance of housing types, sizes and tenures; further information is to be found in the sites schedule, Appendix 2;
- c. All new housing sites will comprise a mixture of housing sizes and / or types or tenure;
- d. Where the inclusion of purpose built Build to Rent accommodation is justified as part of a broader housing mix, delivery should occur on Strategic Sites or, where units will operate as HMOs, be in HMO appropriate locations in accordance with policy H3;
- e. [De-]Conversion of commercial and community use premises located in out of centre ribbon development to residential uses will be encouraged, alongside bringing spaces above shops [back into] viable residential use in accordance with Policy SP7 and subject to Policies H3, SP3, J2, INF5 and INF8;

- f. Housing densities will reflect environmental capacity, (as per SC1-5) local context and character (in line with Policies S1 – S6 and SP3) and be appropriate in relation to the availability of open space (including public green space, private gardens and play space), transport, retail, community and other supporting facilities as per S1 and INF9; and
- g. Windfall sites not identified by site allocations, and outside of SIL, LIL and MOL and greenbelt which come forward for residential development, will be supported subject to their addressing all relevant policies in the Plan.

### **3. Design and Technical Criteria:**

- a. The appropriate mix of housing sizes, types and tenures will be determined through:
  - i. primarily the consideration of the need to secure quality, mixed and balanced communities;
  - ii. scheme viability;
  - iii. the availability of subsidy;
  - iv. the existing mix of housing in the area; and
  - v. the individual circumstances of the site in terms of site conditions, local context and site features, particularly on sites delivering below 10 units.
- b. All new homes should meet the internal space standards of the London Plan as a minimum, as well as provide adequate external private open space (as set out in Supplementary Planning Guidance and subsequent updates) or if specialist housing, those set out in Policy H3;
- c. 90% of new build homes should meet requirement M4[2] of Building Regulations Approved Document M (for 'accessible and adaptable dwellings'); 10% of new build homes should meet requirement M4[3] (for 'wheelchair user dwellings');
- d. Provision of wheelchair user dwellings (Part M4[3]) should be directed towards local need in terms of size, tenure, and demand for wheelchair user adapted homes, determined through early engagement with relevant LBN service areas;
- e. Purpose built Build to Rent accommodation must:
  - i. operate under unified ownership and management within blocks or phases of at least 50 units;
  - ii. be secured in perpetuity for the rental market and for a minimum 15 year term; and
  - iii. offer long term tenancies for private renters for a minimum of three years with a six month break clause in favour of the tenant, with structured and limited in-tenancy rent increases agreed in advance;

- f. Specifically in relation to private rented sector products (PRS) offsite contributions to family housing will only be acceptable where onsite or offsite provision is proven to be unfeasible and provided that these are proportionate and financially neutral; and
- g. Proposals on sites capable of delivering more than 10 units comprising less than 39% family housing, are required to be accompanied by a detailed viability appraisal as per the requirements set out in H2:3.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Spatial Strategy paragraph d only.

**Table H.A**

Site Reference	Site	Allocation
HSG1	North of Forest Gate Station E7	Residential-led, mixed use
HSG2	Bow Street	Residential
HSG3	Methodist Church Community Centre	Residential-led, mixed use
HSG5	McGrath Road	Residential
HSG6	236 Romford Road	Residential
HSG7	Wordsworth Avenue	Residential
HSG8	42 West Ham Lane	Residential
HSG9	156 - 158 Katherine Road	Residential
HSG10	Former Lea Bon Club	Residential
HSG11	95 Arragon Road	Residential
HSG12	236-242 Barking Road E6	Residential
HSG13	Nelson Street / High St North	Residential
HSG14	Hartington Close / Vandome Rd	Residential
HSG16	Grange Road	Residential
HSG17	Kent Street - Court Area	Residential
HSG18	Doherty Road	Residential
HSG19	Beckton Road E16	Residential
HSG20	Canning Town Area 4	Residential
HSG21	Baxter Road / Alnwick Road	Residential
HSG22	Balaam Street Garage	Residential
HSG23	Balaam Leisure Centre	Residential
HSG24	Cyprus 4	Residential
HSG25	ExCel Site 4	Residential-led, mixed use
HSG26	ExCel Site 3	Residential-led, mixed use
HSG27	Leonard Street	Residential
HSG28	Former Tate Institute, Wythes Road	Residential
HSG29	Rymill Street E16	Residential



<b>HSG30</b>	<b>Barrier Park North</b>	<b>Residential</b>
<b>HSG31</b>	<b>Albert Road / Fernhill Street E16</b>	<b>Residential</b>
<b>HSG32</b>	<b>Abbey House</b>	<b>Residential-led, mixed use</b>
<b>HSG33</b>	<b>15-21 Leytonstone Road</b>	<b>Residential-led, mixed use</b>
<b>HSG34</b>	<b>David Street</b>	<b>Residential</b>
<b>HSG35</b>	<b>Rosebery Avenue</b>	<b>Residential</b>
<b>HSG36</b>	<b>Prince Regent Lane (Falcon Carriage)</b>	<b>Residential</b>

## Justification

6.113 The delivery of quality and varied new homes is essential to meeting Local Plan objectives of providing for local and strategic needs arising from population and economic growth, in turn creating high quality, safe and secure places, with stable, mixed and balanced communities that work. Whilst Newham has a long history of welcoming new communities and benefits from a rich diversity, the high level of in-migration and the relatively cheap rents of East London that attract them have tended to be exploited by landlords who have created small [often sub-standard] flats and [often poor quality, over-crowded] HMOs in former family housing, reducing choice and eroding quality, with many people as a consequence passing through rather than setting down roots. This in turn has further affected community resilience and the extent to which people invest in improving their environment. Choice has also in the past been affected by smaller units dominating new-build supply, and quality by a failure of infrastructure investment to keep pace with growth, or in some cases, by poorly located housing. Quality in supply also becomes increasingly important with rising densities in order to compensate for intensity that comes with meeting housing need.

6.113a Offering choice in housing through new quality supply (including that with specialist adaptations) is therefore vital to securing a successful, stable and inclusive place, ensuring housing supply can meet the differing needs of a diverse population and continue to do so throughout the course of their lives, as circumstances change, thereby reducing the need to move out and encouraging people to stay in the area, reducing churn and generating a resident population who have a strong stake in the borough's future. This is covered by the various policy interventions including those introduced for Build to Rent accommodation, which as with other tenures, aim to ensure a viable rental offer that encompasses the kind of quality and security that will keep people in their homes, and in Newham for longer. In turn, housing quality in itself and as part of neighbourhoods where people have access to high quality amenities and good transport links due to appropriate infrastructure development, location of housing, and densities commensurate with accessibility - benefits health and well-being and economic development outcomes, supporting Convergence objectives.

6.113b Therefore, whilst with rising land prices there is a tendency by some developers to suggest that housing quality (notably space standards) should be compromised to achieve affordability, or housing numbers and densities should be prioritised over mix or locational considerations, this is not seen to be an appropriate path to take in light of these other objectives. It is noted for instance, that the infrastructure policies / identified infrastructure requirements of the Plan are linked to a projected level of delivery that accounts for these

factors. Equally, it follows that, if a site is judged to be suitable for residential, it should be suitable for all families as much as smaller households, as per the existing situation in and around many of the Borough's town centres.

6.114 Notwithstanding the above, housing numbers are important, and Newham, given its high birth rate and levels of in-migration has a growing local need<sup>1</sup>, as well as the ability to accommodate strategic need beyond this due to the extent of development sites. The London Plan sets 10 year housing targets for all London boroughs, cognisant of both capacity and Pan-London need, with the aim of targets being met and exceeded between 2015 and 2025. The current target places a 'general conformity' commitment on Newham to provide 19,445 homes within this timeframe, however the period of the Local Plan (2018 – 2033) requires consideration of housing delivery further into the future.

6.114a Through a range of data sources and taking into account other policies of the Local Plan that require homes to come forward with job creation and supporting infrastructure for quality mixed and balanced communities, the number of homes that may realistically come forward during the Plan period, as well as the timing of delivery has been estimated. Assumptions not only take into account extant permissions, regeneration plans and known activity within the borough, but also attempt to account for projected rates of infrastructure delivery and investment and market interests, as well as factors such as market absorption rates, availability of finance and construction capacity. Delivery of new homes ultimately however depends on such macro-economic factors affecting build rates. These will continue to be impacted by economic cycles and the availability of grant and infrastructure funding, both of which will have a profound impact on national house building.

6.114b The table below demonstrates that the Council has the capacity to meet and exceed London Plan targets with a 19% uplift by the end of the ten year period (up to 2025). Beyond this to 2033, a capacity derived figure (exceeding the London Plan 2016 annual targets) has been identified. Recognising continued strategic pressures to increase housing supply using the same percentage increase seen in the period up until 2025, a further uplift of 19% has been added to the capacity derived figure. When combined, the total housing supply sought by policy within the plan period is in excess of 43,000 units. The table below provides an indication of housing delivery in each Community Neighbourhood Area throughout the plan period. It does not however account for an additional small sites estimation in excess of 1500 units, that will add to identified capacities.

### **Newham's Core Strategy**

#### **Housing Delivery by Phase and Community Neighbourhood / Spatial Policy Area**

<b>Community Neighbourhood Area</b>	<b>2017/2018</b>	<b>2018/19 – 2022/23</b>	<b>2023/24 – 2027/28</b>	<b>2028/29 – 2032/33</b>	<b>Total</b>
Stratford and West Ham	18	258	2623	1044	3943
Royal Docks	450	3457	2937	1254	8098

<sup>1</sup> Full Objectively Assessed Need (OAN) 2011 – 2033: 51,800 units.

Custom House and Canning Town	852	4688	7061	2079	14680
Beckton	0	1569	1634	1910	5113
Forest Gate	14	213	770	257	1254
Plaistow	25	148	130	77	380
Manor Park	12	79	482	688	1261
Green Street	79	1086	974	406	2545
East Ham	20	371	1095	412	1898
Total	1470	11869	17706	8127	39172

NB. Figures are net and rounded and subject to periodic review. Updates will be published in the LBN Annual Monitoring Report. This table is updated based on the latest available information on sites as of November 2017.

6.114c The majority of housing delivery will take place as part of large scale mixed use development on strategic sites, however a number of non-strategic housing sites for either residential, or where specified, residential-led mixed use development, are also allocated for their potential to deliver at least 10 units each, highlighting the opportunities to the market. These sites, together those with a recent consent for residential development, are required to be built out for conventional housing (at least in part) in order to meet the assumptions set out above, and the associated strategic principle gives a clear statement to the market of this expectation. Conventional residential is in turn specified because this is where greatest need lies, given that infrastructure has been planned in light of projected housing delivery of this type, and because conventional housing is inherently more flexible than other types of housing to meet a broad range of needs, particularly when designed well.. The Sites Schedules in Appendix 1 and 2 provides further information relevant to allocated site's delivery. The following table sets out the approximate capacity (subject to design-stage refinement in line with policies) of these sites by spatial policy area to the nearest 5 units.

**Indicative Housing Delivery from Non-strategic Site Allocations by Spatial Policy Area:**

<b>Spatial Policy Area</b>	<b>Approx. Capacity</b>
Stratford and West Ham (S2)	131
Royal Docks (S3)	322
Custom House and Canning Town (S4)	1541
Beckton (S5)	180
Urban Newham (S6)	240 (of which the majority are in East Ham and Forest Gate)

- 6.114d The Council also welcomes delivery on unallocated ‘windfall’ sites that come forward for residential development, where these are not subject to employment allocation or MOL / Green Belt designation, and provided they address all relevant policies in the plan. This includes a known source of delivery from conversions of out of centre commercial development, in accordance with other policies of the Local Plan that encourage strong commercial and retail centres.
- 6.116 The latest evidence reinforces that the greatest housing need within Newham is for 3 bedroom homes, in both market and affordable housing tenures<sup>2</sup>. In attempting to facilitate the maximum housing delivery in general, without impeding the potential for family housing supply, the policy requirement for 3 bedroom housing is set at 39% of units for developments capable of delivering 10 homes or above. However, simply requiring a proportion of new homes coming forward as 3 bed units is not enough to satisfactorily deliver the necessary housing to support the creation of mixed and balanced communities, thus a mix and balance of quality housing types (including sizes and tenures) that meet internal space standards and provide adequate private amenity space is also sought by policy, a factor which does not favour the delivery of studio units. Overall, together with other policy criteria and an Article 4 Direction, (introduced across the Borough on 31 July 2013) requiring planning permission be sought for the conversion of single household residential properties to small HMOs (3-6 occupants) this is designed to ensure that a satisfactory balance of housing is provided that also respects the existing urban character of the area and reflects the economics of provision. Ultimately, the mix and tenure of individual schemes will be assessed on a case by case basis, taking into account factors set out within the technical criteria. Policies protecting existing family housing are set out under Policy H4.

## Implementation

- 6.117 The Local Plan sets out the parameters of housing development to achieve the objectives of building mixed and balanced communities where significant delivery of quality housing, will meet need up until 2033. New homes, largely on allocated sites will come from a range of sources including intensification, town centre renewal, growth areas, mixed use redevelopment particularly of surplus commercial uses on non-designated employment locations, and sensitive renewal of existing residential areas. Together with explicit support for the realisation of windfall sites (in appropriate locations), overall policy and allocations ~~and~~ support significant housing delivery by providing for a degree of certainty.
- 6.121 It should be noted that the term ‘Housing’ refers to any lawful accommodation as defined by legislation (including Planning and Housing Acts and Building Regulations). Housing policy will be implemented via the development management process and proposals should be accompanied by statements that set out the responses to the relevant criteria.
- 6.121a All developments, including built to rent, private sector (PRS) products, should aim to meet the policy requirement to deliver a mix in housing supply. This includes for developments capable of delivering 10 units or more, meeting the 39% family housing target, with schemes only capable of accepting lower on site family housing levels, incorporating

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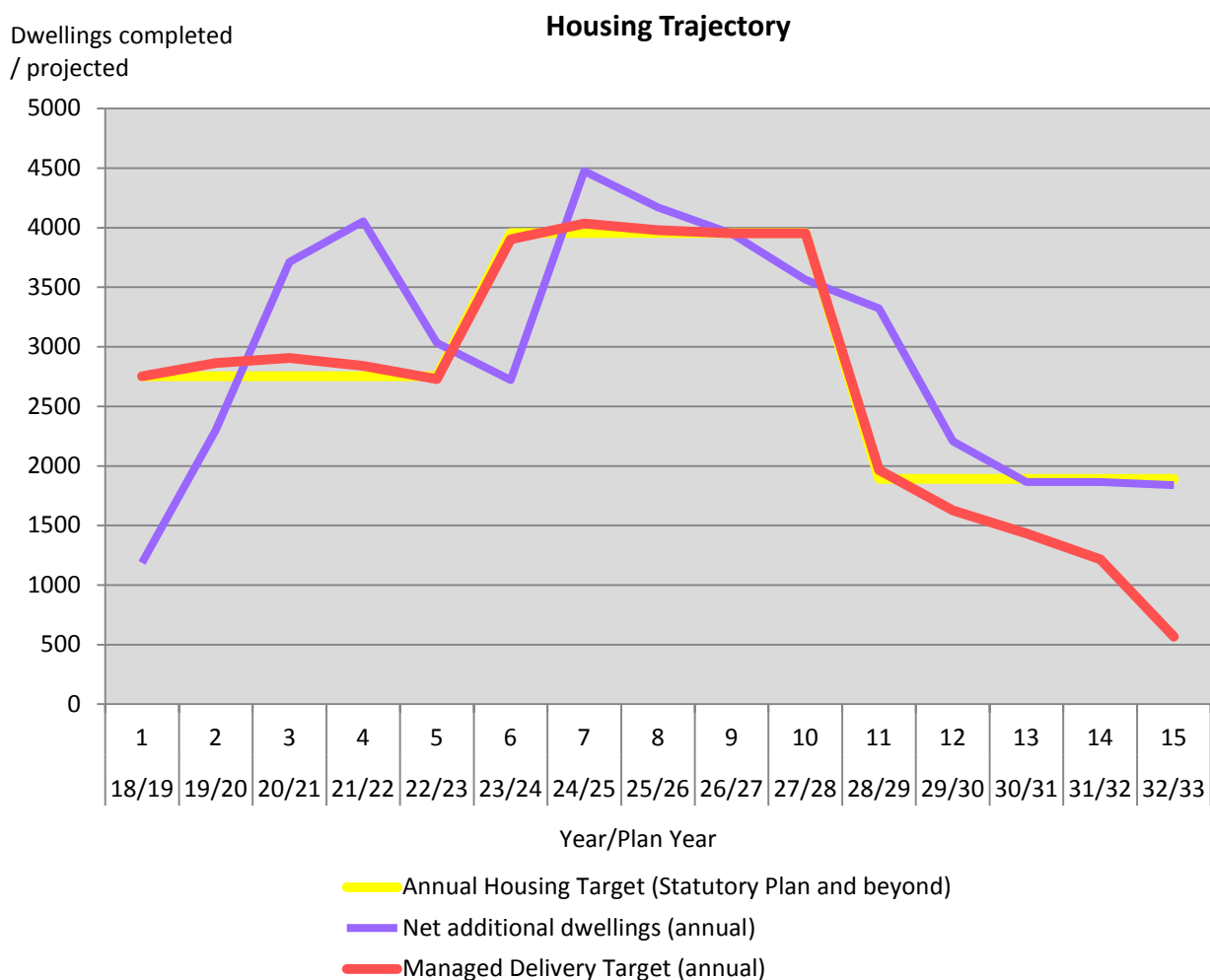
<sup>2</sup> 3 bedroom homes accounts for 64% of total OAN (see footnote 1). Of the total *market* and total *affordable* housing needs 68% and 59% respectively is for 3 bed homes.

measures to secure provision off site. However, applicants are strongly encouraged to recognise that families have a need for 3 bed housing across all tenures, including private rental housing. Where eligible proposals comprise less than 39% on site family housing, viability assessments as per the requirements set out in H2:3 (based on an EUV+) approach should be submitted.

- 6.121b As strategic principles set out, in considering appropriate densities, including accounting for the local context, - which also includes any emerging context as per the spatial policies - the provision of quality family housing should also be factored in, as well as local infrastructure capacity and accessibility (as per S1, INF9) and broader environmental capacity (as per policies SC1-5) being aware, as per SC4, that this process may require impact on any European site to be considered, having regard to all relevant information available at the time and other relevant policies (see also INF2, INF7). Design responsive to context (as per SP3 and SP5) should be able to achieve the necessary quality across all sizes of housing on a site. As per policy S1.3a, comprehensive development and masterplanning (including associated capacity testing) are the expected vehicles through which such issues are resolved, and to secure appropriate integration of housing typologies and tenures, and overall residential quality.
- 6.121c The format of Build to Rent / PRS products should accord with definitions of the London Plan (as carried through into subsequent SPGs) and is suitable for single household or HMO occupation.
- 6.121d In addition to family housing, applicants should aim to deliver variation within unit sizes, rather than simply the required quantum of family housing with remaining units of a single uniform type. Where a site is large enough, a balance in tenures subject to policy H2, is also expected.
- 6.121e Where sites are subject to non-strategic residential or strategic site allocations, or if a consent for residential has been granted on any site within the last 3 years, as part of guaranteeing housing supply in accordance with unit estimations in tables above, the site must deliver (at least in part) conventional housing. Applications for accommodation that is solely specialist in nature, will not be acceptable in these instances.
- 6.121f Development proposals' responses to policy criteria ~~these~~ will be secured by condition or legal agreement as appropriate. Other policies to which there is a logical link are highlighted, encouraging responses that deal with the issues in an integrated way. It is also the Council's intention that its published evidence base on these matters and online Public Access records of consents should help to indicate the in-principle acceptability (or otherwise) of relevant proposals.

## Monitoring

- 6.122 Housing delivery (both in real terms and projected) of varying types, sizes, and tenures will be kept under review, drawing on data input to the London Development Database and published in the LBN Authority Monitoring Report and associated Housing Monitoring Bulletins. This will include monitoring of the Council's Housing Trajectory and 5 Year Housing Land Supply, set out in the graph below and informed by the table in para 6.114b above. This will be used as the basis for understanding changes in the levels of existing and forecast house building.



In light of the variations in supply projected over the plan period, the 5 Year Housing Land Supply will be measured through a stepped trajectory with a different target for every 5 year phase of the Plan, as follows:

Delivery Period	Years	Annual Delivery Target
Short Term	2018/19 – 2022/23	2752
Medium Term	2023/24 – 2027/28	3956
Long Term	2028/29 – 2032/33	1892

6.122b Upon publication of the final (revised) London Plan, if the Local Plan as written is delivering a significant shortfall against updated targets, early review (of housing delivery) will be undertaken.

6.122c Additionally, the below outcomes indicators will help to inform changes to future policy via updated assessments of need and capacity. In addition, in house activity monitoring, statutory returns, independent surveys of residents commissioned by the Council and S106 reporting together with national statistics will be drawn upon. Other relevant output and

outcome indicators are found under Policy H2 and SP3. Both output and outcome indicators are inevitably affected by other factors, which will be noted in analysis.

#### 6.122a Indicators

- i. H-OP1 Building Mixed and Balanced Communities:
  - a. Net additional dwellings and housing trajectory and 5 Year Housing Land Supply against housing supply targets. [As per Local Plan];
  - b. Housing density (apply on major housing developments only) against London Plan targets [no specific target: monitor against density ranges of the London Plan];
  - c. Housing mix and choice:
    - i. Family housing gains from both approvals and completions against policy targets (39% 3 bed) including a comparison of approvals of houses ~~cf~~ and flats [no specific target – monitor for upward trend in terms of proportion of houses];
    - ii. The proportion of units, based on size, delivered in each tenure [ no specific target for more balanced provision, notable upward trend in market provision of family units]; and
    - iii. Overall size mix within tenures, [no specific target; monitor for expected upward trends from policy intervention];
  - d. Housing Quality:
    - i. Space standards, [target: 100% of units approved through consent meet London Plan space standards];
    - ii. Delivery of wheelchair homes and number of households housed each year in wheelchair adapted homes (by size) [target: 10% of housing completions (by scheme) meet Part M; no specific target for households housed, but should be related to an improvement in monitoring indicator H-OUT1c];
    - iii. existing stock improvements [no specific target, reporting of activity to show general commitment to this principle];

- ii. H-OP5 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny];
- iii. H-OUT1 Housing need:
  - a. Homeless households in temporary accommodation;
  - b. Number of households on the Local Authority waiting list [no specific target: should be decreasing; compare to surrounding boroughs and London average to assess convergence, and monitor as a market signal];
  - c. Number of people waiting for a wheelchair adapted home by number of bedrooms required, and average waiting times [target: no specific target, should be decreasing];
- iv. H-OUT2 Housing quality / stock conditions [no specific target, monitor for trends relevant to policy objectives].



## H2 Affordable Housing

Proposals that address the following strategic principles, spatial strategy and design, technical and management criteria will be supported:

### 1. Strategic Principles and Spatial Strategy:

- a. The need to ensure that 50% of the number of all new homes built over the plan period are affordable units;
- b. The need to ensure that affordability is not delivered at the expense of quality, housing mix, or through size minimisation;
- c. The requirement that, subject to the appropriate mix considerations within Policy H1 3a, developments or redevelopments on individual sites with capacity for 10 units or more, ~~to~~ provide either:
  - i. Between 35-50% of the number of proposed units as affordable housing comprising a tenure mix of 60% social housing and 40% intermediate homes;
  - or
  - ii. within Canning Town and Custom House Regeneration Area a tenure mix of 65% of the number of proposed units as market housing and 35% affordable housing, evenly split between social housing and intermediate homes for all development sites identified for residential use;and
- d. Exceptionally, consider off site provision or payment in lieu where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions/features or local context, including tenure mix and provided that it would result in the ability to secure a higher level of affordable housing provision.

### 2. Design and Technical Criteria:

- a. Proposals delivering below 50% of the total units as affordable housing and/ or that do not meet the required tenure split, are required to be accompanied by a detailed viability appraisal with Benchmark Land Value that relies on an EUV plus approach; or
- b. Within the Canning Town and Custom House (CTCH) Regeneration Area (as shown in S4) proposals delivering below 35% of the total units as affordable housing are required to be accompanied by a detailed viability appraisal with Benchmark Land Value that relies on an EUV plus approach; and
- c. Where Build to Rent (PRS) is proposed, dual viability assessments are required that incorporate viability testing that set outs outcomes in relation to 'Build for Rent' and 'Build for Sale' approaches and the subsequent impact upon the delivery of affordable housing. Where it is demonstrated that a build to rent approach will deliver less affordable housing in terms of a capital subsidy, a revenue subsidy may be considered as

**an appropriate alternative.**

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles and Spatial Strategy.

### Justification

- 6.124 As part of the creation of high quality places that meet local and strategic needs in turn ensuring stability that encourages people to live work and stay in Newham, it is essential that the delivery of affordable housing continues to take place alongside that of market accommodation. As with the rest of London, demand for affordable housing is high and Newham already accounts for a large proportion of the future housing supply of London's and the sub-region and has considerable needs of its own, both in terms of market and affordable housing need. Newham also has a high proportions of social housing compared with other areas of London. Bearing this in mind, and in the context of aspirations for the creation of mixed and balanced communities, policy seeks to add to the overall strategy by facilitating a range of accommodation that allows people to move between tenures and property size as their household and economic circumstances change. This means attempting to employ the use of a number of genuine affordable housing options, which include social rent, affordable rent and intermediate housing such as low cost home ownership products (see glossary for a definition of terms), to assist working people on low wages into their own home. It is considered that this will help stabilise communities and reduce churn, resulting in improved community cohesion.
- 6.125 As with all London boroughs, Newham is directed by the London Plan to provide an overall strategic affordable housing target in its Local Plan to meet local and strategic needs, and to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed use schemes. Evidence points to a maximum strategic target of 50% of homes to be affordable during the plan period, based on Newham's level of need and scheme viability. However, this level of provision may not be immediately achievable on all sites within Newham, therefore recognising the variation in land values that already exists in different areas of the borough, as well as the potential for significant growth during the plan period that will impact such values, affordable housing is sought through a negotiation target that ranges between 35 and 50% of total units within a scheme. Within this stipulated range, in accordance with pan-London needs, the tenure split sought by policy is 60% of units delivered are to be social housing (i.e. social rent or affordable rent or a combination of the two) and 40% are to be intermediate homes. Whilst it is accepted that unique circumstances may mean that some schemes will be unable to provide affordable housing within this range, varying scenarios have been modelled to consider different circumstances (including growth rates) over the entire plan period. Evidence indicates that 50% affordable housing is achievable on some schemes currently and it will become increasingly achievable on a greater number of sites throughout the next 15 years. Moreover, many schemes can achieve at least 35% at present, in some cases due to grant funding or other forms of subsidy including the off-siting of provision. For these reasons, this target range is considered to be robust provided it is applied flexibly on a case by case basis in accordance with policy H1.

- 6.126 Variation in this split applies to proposals in the Canning Town and Custom House Regeneration Area, where 65% market housing and 35% affordable, evenly divided between social housing and intermediate tenure is sought, due to the existing tenure split, which comprises a relatively high proportion of social housing. This reflects the objective of delivering mixed communities; diversifying this split and increase the share of market and intermediate housing to improve the housing mix in this area.
- 6.128 Newham's Strategic Housing Market Assessment shows a substantial requirement for people on the lowest incomes justifying their need for accommodation at target rents. Newham has a substantial programme of housing estate renewal (e.g. as part of the Canning Town Regeneration Programme) whereby existing social housing tenants will be offered alternative accommodation under similar conditions. This will require a substantial pool of replacement social rented housing units. Moreover, even within the affordable rent tenure there is a need to cater for varying levels of need.
- 6.132 Notwithstanding the above commitments it is recognised that the amount of grant available to facilitate affordable housing is limited, and the levels of public subsidy across the plan period are inevitably uncertain. Welfare reform and changes to rent levels has and will continue to have implications, and whilst renewed commitments to affordable housing are being made at the London level, the early phase of delivery may see levels of provision against the lower end of the affordable housing targets. That said, this may be mitigated to some extent by the use of alternative models of provision, as well as the relatively high proportion of land in public ownership that is yet to come forward within the Arc of Opportunity.

## Implementation

- 6.132a The Local Plan recognises the overriding importance of the creation of mixed and balanced communities, and that actual provision of affordable housing against the targets will vary from case to case to ensure that the communities that are created are balanced and sustainable in the longer term. Overall, affordable housing delivery will aim to achieve 50% of the total units as affordable within the plan period ~~be~~ through a variety of sources, including new private sector developments, local authority developments, schemes funded independently, and vacancies brought back into use.
- 6.132b For units to be considered to be 'affordable' in policy terms, provision must meet the affordable housing definitions set out by the London Plan. Other types of housing, including that where quality (notably space standards) is compromised under the guise of providing cheaper accommodation than the local context, is not an acceptable substitute for genuine affordable housing options required by policy.
- 6.132c Policy that enables the delivery of affordable housing will be implemented via the development management process, with the negotiation target of between 35% and 50% of total units within a scheme being affordable (with policy compliant tenure splits) applied having regard to the appropriate mix considerations in policy H1. When accounting for local context, this should include consideration of any decant or right to return requirements. A site's capacity to deliver 10 or more units will be determined through density assumptions calculated using an established methodology in accordance with the

SHLAA. Given the 50% affordable housing over the plan period is the strategic target, and site targets are 35-50% of units, this does not preclude 100% affordable housing schemes when justified in relation to mix and tenure considerations.

- 6.132d Detailed Viability Appraisals are required to accompany all schemes that fall below the maximum affordable housing threshold set out within policy. Such appraisals should provide justification for the level of affordable housing achievable against benchmark land values that rely on an 'Existing Use Value plus premium' approach. This allows a landowner to receive at least the value of the land in its pre-permission or lawfully permitted use, with a premium added as an additional incentive to release the site, having regard to site circumstances (which will vary). Premiums above EUV should be justified, reflecting the circumstances of the site, and the LPA will consider the robustness of any assumptions in this regard. The level of premium can be informed by benchmark land values that have been accepted for planning purposes on other comparable sites.
- 6.132e Appraisals will be scrutinised as part of the application process and information included must be benchmarked against publicly accessible, information (relevant to the local context) and robustly justified. The viability assessment must allow for independent scrutiny by the LPA (or other determining authorities) and anybody who undertakes a review of the veracity of the submission on behalf of the LPA. When an existing use value of a development site is included within a development appraisal this should be evidenced, include reasonable comparative uses in similar condition and circumstances. Alternative use or the hope value associated with the prospective development of the site should be excluded from the viability assessment. Where the amount paid for a development site exceeds the reasonably assessed residual land value this should not adversely impact on the delivery of sustainable development. Commercial land transactions should not diminish the delivery of a quality policy compliant planning application with relevant supporting infrastructure. Notwithstanding that, the process of scrutiny will take into account guidance set out in the London Borough Development Viability Protocol (Nov 2016).
- 6.132f In relation to the delivery of build to rent PRS, policy requirements for affordable housing remain the same. Applicants should ensure where PRS is proposed (either as the only housing type on site, or as an element of a broader scheme) that viability appraisals for PRS developments incorporate sensitivity testing that demonstrates the different outcomes of delivering a proportion of the site as PRS vs. delivering more market sale units (as set out in the PAR) reflecting the commercial choice to deliver PRS. Where exceptional circumstances allow for off site provision or payment in lieu of affordable housing, offsite provision should be delivered before or in line with the PRS element of the proposal, whilst payment should be proportionate and financially neutral. Agreed quotas of affordable units will then be secured by legal agreement, inclusive of being made subject to appropriate review mechanisms. Other policies to which there is a logical link are highlighted, encouraging responses that deal with the requirements in an integrated way.
- 6.132g National and regional policy indicates that the presumption is that affordable housing should be provided on site. However, building in flexibility to the policy approach, the exceptional local circumstances of when it would be acceptable to make off site provision or payment in lieu are set out. Bearing in mind the need to better address priority needs for family housing and still meet the 39% 3 bed units (as per policy H1) and the 35%-50% affordable housing targets, it will be appropriate in some circumstances to provide part of

the affordable family housing off site or to accept a payment in lieu.

## Monitoring

6.132 f Affordable housing delivery of varying sizes, and tenures will be kept under review, monitored against the indicators set out below and published in the LBN Authority Monitoring Report and associated Housing Monitoring Bulletins. In addition, in-house activity monitoring, including concerning S106 negotiations, and DCLG housing affordability statistics will be useful feedback mechanisms.

### 6.132 g Indicators

- i. H-OP2 Affordable housing: gross completions split via tenure and as a percentage of new housing delivered, against policy targets;
- ii. H-OP5 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny];
- iii. H-OUT3 Housing affordability [no specific target, monitor as a market signal].

## H3 Specialist Accommodation Needs

Proposals that address the following strategic principles, spatial strategy and design, management and technical criteria will be supported:

### 1. Strategic Principles:

- a. An overall managed delivery of housing mix will be required ~~to~~ that ensures that the local and strategic needs of all types of households are considered and that appropriate forms of accommodation are provided in the right locations, where this need has been clearly demonstrated.
- b. Purpose-built student accommodation should be provided in a proportionate manner to conventional housing, reflecting strategic and local need;
- c. Older people's housing and specialist provision for other vulnerable people (falling into Use Class C2) will be protected as community facilities / social infrastructure in accordance with policy INF8;
- d. New specialist (Use Class C2) and sui generis nightly stay housing will be directed towards local need; and
- e. The need to deliver temporary accommodation, particularly in the form of modular housing as a meanwhile use, making use of sites identified as suitable for residential through a site allocation, is acknowledged.

### 2. Spatial Strategy:

- a. Accommodation should be appropriately located in terms of the achievement of mixed and balanced communities and the ability to meet the needs of its occupants including via the provision of adequate transport and supporting facilities;
- b. Large and small HMOs should be purpose-built or converted from premises other than family-sized dwellings, subject to policies H1, H3, and H4;
- c. New student housing will be directed to the town centres of Stratford and Canning Town and existing campus developments within the Borough;
- d. Larger specialist residential accommodation (comprising six or more bed spaces) catering to older adults or persons with care needs should:
  - i. Be directed to town centres and those sections of Key Movement Corridors within 400m of a Local Centre or 800m of a Town Centre, unless specific care needs / vulnerabilities justify an alternative location; and
  - ii. Be within 800m of relevant supporting facilities (e.g. specialist healthcare or social/leisure opportunities), if appropriate, in relation to identified needs;

- e. Older people's housing (falling outside Use Class C2) should be delivered as part of the housing mix (and sit comfortably with conventional housing) on Strategic Sites;
- f. Purpose built build to rent HMOs, and otherwise policy-compliant conventional HMO conversions should be directed to Town and Local Centres and along Key Movement Corridors, where compatible with other policies;
- g. Nightly-stay hostels comprising 25 or more bed spaces should be located in town centres or along those sections of Key Movement Corridors within 800m of town centres. Nightly-stay hostels should also be located within 800m of relevant supporting facilities (e.g. specialist healthcare or social / leisure opportunities). Where barriers to Town Centre accessibility exist within an 800m catchment, proposals will be considered on a case by case basis; and
- h. The need to avoid creating or exacerbating cumulative impact hotspots / clusters as defined in policies SP9.

### 3. Design and Technical Criteria:

- a. The need to ensure that the amenities or unique characteristics of the existing neighbourhood are protected and enhanced;
- b. Proposals for housing other than conventional single-family housing:
  - i. Should include an appropriately detailed and resourced management plan demonstrating the residential population mix and other management practices that minimise safeguarding risks, maximise opportunities to create and sustain social networks and access appropriate support, and ensures that the development is neighbourly as defined in policy SP8;
  - ii. Demonstrate the achievement of one of the following quality standards, where applicable:
    - Newham and Pan-London Private Sector Rental Licensing benchmark criteria (for mainstream HMOs and other specialist sui generis multiple-occupancy housing);
    - Care Quality Commission criteria (for Class C2 uses) or any subsequent updates or replacements;
    - Pan-London quality benchmark for temporary (nightly stay) hostels ('Setting the Standard III');
 and
  - iii. In the case of accommodation for (non-nomadic) Gypsies and Travellers that fall outside of the PPTS definition, quality standards should be agreed in consultation

with representatives of the local gypsy, traveller and travelling showpeople community;

- c. Demonstrate proportionality in the provision of student accommodation relative to conventional housing in relation to ~~assessed according~~ the following:
- i. The ratio of Newham's London Plan housing target to the maximum student housing requirement applied equivalently to the borough housing target derived from the London Plan;
  - ii. The quantum and location of recent delivery of conventional housing;
  - iii. The London-wide planning requirement for 26-33% of student accommodation to be purpose-built, as identified by the Mayor of London's Academic Forum; and
  - iv. Whether the development is part of a wider local campus development increasing local need;
- and
- d. The need for new specialist (Use Class C2) and sui generis nightly stay housing to be assessed having regard to the IDP and through advice from the relevant LBN service areas regarding additional local need occupancy from residents from outside of Newham should not on average comprise more than 33% of total residents.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles; 2.Spatial Strategy paragraph b only.

### Justification

- 6.134 As discussed in policy H1's Justification, an overriding concern of the Council is to ensure housing provision that meets a full range of local and strategic needs. At times this means prioritising local requirements against that of pan-London to redress the imbalanced housing supply, stabilising the existing population, building quality sustainable mixed and balanced communities where people choose to live, work and stay.
- 6.134a The range of housing needs of Newham's diverse population is varied. A wide and flexible housing offer will help to cater for a broad range of needs throughout the lifetime of a household, including specialist accommodation such as older persons housing and facilities that provide support through provision of external care that may allow for ongoing occupation of the original family home. However, it is also recognised that there are circumstances where conventional housing is either not best suited to, or cannot meet the needs of a household or a specific group, thus policy is designed to enable (and in some cases protect) specialist accommodation for inter alia, vulnerable adults, older persons, individuals with support needs, those at risk from violence, and those otherwise requiring refuge, where need can be demonstrated.
- 6.135 In achieving Local Plan objectives policy provides clear specification for requirements in relation to specialist housing, to ensure that developments of this type-do not undermine



other core principles of the Plan. This means not only enabling quality accommodation that meets need, but also ensuring that it is in the right spatial location, both for the benefit of occupants in terms of access to transport, facilities and support services, but also in safeguarding the amenity of any surrounding residential development, from nuisance and anti-social behaviour. Moreover, in the context of limited land supply, and relatively cheap land/rents that has encouraged demand for such uses from outside of Newham to manifest here, the policy seeks to ensure that certain forms of specialist and other high occupancy housing, notably nightly-stay hostels for homeless people, specialist private student accommodation and multiple occupancy housing (HMOs, for occupation for groups other than single households), do not impede the delivery of conventional housing, strengthening the ability to achieve the right housing mix. In doing so, it acknowledges the inherent greater flexibility of conventional housing to meet a range of needs if designed appropriately.

- 6.139a The dispersal of student housing alone without, for instance, wider university campus provision and the associated jobs and economic benefits goes against the grain of the Local Plan's emphasis of the provision of both. Considering this, accepting that Newham has a strategic role to play in meeting pan-London housing need and recognising the requirement for some purpose-built specialist provision for students attending local institutions, the policy seeks to provide a proportionate delivery of student housing against that of conventional supply, directing it to appropriate locations. In doing so, the policy: provides an assessment mechanism for bringing forward this type of accommodation using the mainstream housing target in Policy H1 and comparing this to student housing need; accounts for the actual 5 year delivery and the evolving nature of housing provision in a community neighbourhood and ward area; considers the proportion of local need which it may be appropriate to provide for within specialist accommodation; and prioritises mixed use development bringing jobs and homes. Given fluctuations in delivery on an annual and broader basis, the policy does not set absolute targets, instead providing guidance as to where additional student housing provision may be unbalancing and displacing more flexible conventional housing provision.
- 6.139b With a generally ageing population across London, the policy also seeks to ensure delivery for the older peoples' care sector, in accordance with indicative strategic benchmarks set out within table A5.1 of the London Plan, 2016. To add to this, housing in Use Class C2 (residential institutions) is protected in the same way as social infrastructure provision via policy INF8 and London Plan Policy.
- 6.139c Given rising cost of living, together with Government welfare reform, demand for temporary accommodation (particularly for families that experience homelessness) is on the rise, often being met by bedspaces within nightly stay hostels. Acknowledging this, and seeking to provide policy that positively responds to this need through innovative means that take advantage of available land, specific support is provided for modular housing as a meanwhile use.

- 6.139d As with many forms of high-intensity uses, multiple-occupancy housing can result in impacts beyond those of conventional housing, for example, through increased trip generation, or the amount of waste and noise generated. These impacts may further be exacerbated when the multiple occupancy is made up of a specific demographic, where for example a similarity of lifestyle or need might result in use of local facilities or public spaces at similar times, or generate demand such that the provision of local facilities becomes skewed towards them (for example, students and the night-time economy). While all housing needs can be accommodated within the Borough, this provides the Local Plan's spatial strategy for specialist accommodation in order to manage such impacts (both positive and negative).
- 6.139e Town centre locations are most accessible to a range of users. They have better public transport and infrastructure in place to manage large congregations of people, as well as a range of facilities that people need (and can benefit from) in the course of a single trip. Key corridors in their function as public transport routes similarly provide enhanced access to services and supporting facilities and, like town centres, tend already to be busier, livelier locations. Both areas are considered capable of successfully accommodating larger forms of specialist or multi-occupancy housing. In turn, there is also the opportunity for centres to benefit from the additional spend and investment generated from increased numbers of people.
- 6.139f The need to consider the location of specialist housing in relation to support services such as sources of employment, training and job search, healthcare (including specialist healthcare) and schools, is vital. Whilst such services should be accessible to all of the Borough's inhabitants, it may be all the more significant for those with extremely limited access to resources (for whom cost of travel is a barrier) or those with mobility issues (for whom proximity is key). To tackle this, the policy sets various accessibility benchmarks to town and local centres and key movement corridors. It is recognised within the policy however that in certain instances barriers to locations within accessibility catchments will exist and should be considered when development applications are assessed.
- 6.139g Finally, as part of improving housing mix and providing genuine housing options for sustainable and resilient communities, the policy provides clear quality specifications which relate to specialist and multiple occupancy housing. Whilst there are large scale new developments across the west and south of the Borough which have been assessed against high-quality housing policies, there are also large areas of existing housing throughout the Borough which requires improvement to achieve the aims of high quality housing for all.
- 6.139h These requirements set basic development parameters preventing poor design features such as excessively small bedrooms, lack of natural daylight, poor ratios of communal spaces to occupants (resulting in over- used facilities) as well as poor management practices that do not address safeguarding concerns. These issues appear to be particularly prevalent in premises not subject to regulation, but also in forms of accommodation where

the demand is strong and provision may sit alongside other pressures (e.g. homeless emergencies requiring accommodation at short notice on tight budgets).

## Implementation

- 6.140 The overarching policy intention is to recognise the need for specialist housing provision, seeking to manage its delivery against conventional units, whilst ensuring a supply of quality, fit-for-purpose accommodation that is appropriately located. This will ensure a balance between satisfying local and wider pan-London needs, whilst delivering quality accommodation accessible to infrastructure provision that supports the development model and residents alike and provides ~~is fit for purpose~~ the benefit of lessening any potential impacts of specialist housing on the surrounding area. It also gives a clear market signal about expectations for sites allocated for residential and opportunities therein, supporting delivery by providing for a degree of certainty.
- 6.140a To this end, policy will be implemented via the development management process in co-ordination with the relevant LBN service areas and through the application of GIS analysis in the assessment process, drawing on the Council's survey work and associated GIS records. To assist the application process, it is the Council's intention that its published maps (such as Key Corridors, town and local centre boundaries etc.) and online Public Access records of consents can be used to help indicate the in-principle acceptability (or otherwise) of relevant proposals in particular locations.
- 6.140ai In relation to older person's housing falling outside of Use Class C2, delivery on sites should aim to satisfy the targets of the London Plan whilst ensuring a commercially viable offer, typically considered to be a minimum of 50 units. Affordable housing contributions will be anticipated in accordance with policy H2.
- 6.140b It is the policy intention that applicants recognise the wider resilience agenda that housing can contribute to, particularly in terms of design and management in the delivery of quality. In achieving this, proposals should be accompanied by statements and a management plan that set out the responses to the relevant criteria; these will be secured by condition or legal agreement as appropriate. Other policies to which there is a logical link are highlighted, encouraging responses that deal with the issues in an integrated way.

## Monitoring

- 6.140c Delivery of specialist housing provision will be kept under review, monitored against the indicators set out below and published in the LBN Authority Monitoring Report and associated Housing Monitoring Bulletins. Ongoing engagement with commissioners and others that work with groups needing specialist housing will also be an important feedback mechanism. In addition, associated outcomes such as out-migration (churn) and satisfaction with the area will also be assessed as part of the overall monitoring of the Local Plan (see S1) and decisions and appeals monitoring supports assessment of policy relevance and effectiveness.

#### 6.140d Indicators

- i. H-OP3 Specialist Forms of Housing- Net completions of specialist accommodation:
  - a. student accommodation [no specific target: monitor for proportionately to conventional housing];
  - b. sui generis nightly-stay bed space [no specific target, monitor for provision according to need in discussion with commissioners];
  - c. Use Class C2 accommodation [no specific target, monitor for provision according to need in discussion with commissioners];
  - d. Older persons housing and extra care bed spaces [no specific target, monitor for provision as part of housing mix, cognisant of London Plan benchmark] as a proportion of overall housing delivery;
- ii. H-OP5 Policy Use & Robustness [No specific target, monitor for expected use and ability to withstand appeal scrutiny].

## H4 Protecting & Re-shaping the Existing Housing Stock

Proposals that address the following strategic principles and spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles and Spatial Strategy:

- a. All housing including affordable and specialist housing, will be protected unless replaced with at least equivalent floorspace;
- b. The-Council will specifically protect 3 bed and 4+ bed family housing; and
- c. De-conversion of flats and HMOs back to family dwelling houses (Use Class C3) will be supported.

### 2. Design and Technical Criteria:

Notwithstanding the above criteria, the subdivision or conversion of:

- a. 3+ bed housing, subject to the satisfaction of other policies, may be appropriate where proposals deliver high quality conventional housing that also enhances the street scene and:
  - i. Are located in a town or local centres, or along those sections of quality movement corridors or linear gateways within 400m of town or local centres;
  - ii. Are located above an existing, occupied commercial unit;
  - iii. Do not have access to external private amenity; and
  - iv. Have poorly defined entrances-;and
- b. Large family dwelling houses (4 bedroom plus), may be appropriate where any resulting new units are 4 bedroom plus family dwelling units (Use Class C3), and are accompanied by at least 45 sqm of private amenity space with a minimum width of 4m.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles and Spatial Strategy.

## Justification

- 6.141 As part of creating high quality places, for stable mixed and balanced communities, where people chose to live work and stay, not only is it necessary to ensure new housing is provided, but that the existing stock is protected in accordance with need (see Policy H1). Projected growth in the number of households over the Local Plan period up to 2033 effectively means there should be no (net) reduction in the housing stock, and a key element of the Local Plan is the very clear presumption against the loss of residential floorspace, with particular emphasis on protecting family housing.
- 6.142 Prior to the introduction of policy resisting the loss of family homes and the Article 4 Direction requiring planning permission for HMO conversions in 2012, dwelling conversions to flats or to houses in multiple occupation (HMOs) saw considerable growth in numbers. From 2001 to 2012 the proportion of flats in a converted dwelling doubled from 8.4% of total stock to 16.8%, whilst the overall proportion of all flats grew by 8%. There are now approximately 51,200 households in private rent (around half of the total housing stock) and a quarter of these are occupied as HMOs. These are evenly distributed throughout the borough, however some 'hot spots' are found in Stratford and West Ham, East Ham, Manor Park and Canning Town. Excluding Manor Park and Canning Town, and together with Forest Gate, these areas also have the highest proportions of converted dwellings.
- 6.142a Whilst large proportions of these previously converted dwellings are for private rent, which can provide relatively cheap accommodation for residents, particularly if shared, as many were created from what were originally family-sized dwellings (i.e. those in the highest demand) this has challenged the wider aspiration to stabilising communities, through the reduction of housing choice. Moreover, concerns remain over the negative changes to the character of neighbourhoods resulting from converted homes that lack quality or are poorly maintained, inclusive of how such accommodation may support increased levels of transience, parking pressure and refuse generation, and the associated impact on the external environment and amenity.
- 6.145 It is very clear from analysis of requirements that Newham will fail to provide enough family housing if it does not both increase the rate of new provision (as per H1) and hold on to existing family stock. On this basis the policy largely resists new conversions and seeks where possible to support de-conversion. It is considered that there is sufficient capacity for flats and HMOs through purpose-built new build, conversion of non-residential uses and reuse of redundant premises above shops in Town Centres.
- 6.145a Notwithstanding the above considerations regarding the protection of family homes, it is acknowledged that in some unique circumstances, subdivision or conversion can have multiple benefits or more desirable outcomes than the status quo. To address this, policy includes a criteria based policy clause that would allow subdivision or conversion of existing units in specified circumstances, in turn helping to uplift often underutilised or substandard accommodation, in locations that have often suffered from historical issues with housing quality and where intensification is appropriate.
- 6.145b Additionally, the need for 4 bedrooms homes, whilst modest compared to other housing sizes is not insubstantial, thus any existing large units (4 bed plus) should continue to be protected, as part of ensuring a broad market offer, especially as units of this size are rarely proposed as part scheme mix within new developments. It is however recognised that

some 4 bed plus units may either be large enough or designed in such a way that conversion or subdivision could still enable the supply of other large family units, more aligned with demand, and may help support viable conservation work in large conservation area properties. Policy therefore allows for such conversions provided that adequate amenity space, suitable for family use, is safeguarded to mimic the typical provision for a 3 bedroom home in Urban Newham, maintain character, and avoid the over-extension of houses into gardens being a justification for conversion.

## Implementation

6.146a Policy takes a robust approach to housing protection and stock management, and whilst any listing is not exhaustive, 'housing' refers to any lawful accommodation as defined by legislation (including Planning and Housing Acts and Building Regulations).

6.147 The overarching policy aim to protect the borough's existing stock, including overall floor space and specific housing types that are subject to acute needs based pressures, will be implemented through development management and enforcement process.

6.147a The Council is engaged from time to time in the renewal of stock on estates and is committed to retaining an equivalent number of family and affordable units.

## Monitoring

6.147b Loss of housing, including through in house and LDD decisions and appeals monitoring, will be kept under review, monitored against the indicators set out below and published in the LBN Authority Monitoring Report and associated Housing Monitoring Bulletins. Outcome monitoring will be through broader churn and satisfaction indicators set out in S1. Engagement with residents and elected members will be important feedback in terms of the exceptions clauses.

### 6.147c Indicators

- i. H-OP4 Protecting and Re-Shaping Existing Housing:
  - a. Net Loss of conventional homes (C3) including loss of family homes [Target no net loss; and no loss of family homes unless in the circumstances the policy allows for];
  - b. Net loss of accommodation in C2, C4 and Sui Generis HMOs, monitored via approval data [Target: no overall net loss];
- ii. H-OP5 Policy Use and Robustness (no specific target, monitor for expected use and ability to withstand appeal scrutiny).

# SC1 - Environmental Resilience

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

## 1. Strategic Principles:

- a. In design, construction, and operation, development must respond to the known effects of climate change, including the likelihood of extreme weather events, geohazard risks, increased water scarcity and warmer temperatures;
- b. Development must be resource-efficient, recognising the increasing pressure on resources due to population growth and environmental stress as well as the economic opportunities of 'waste';
- c. Bolstering the Council's wider resilience agenda, development will promote local production (notably food growing), procurement, and labour (see J3);
- d. Ameliorating past environmental degradation (as evident in water quality, habitat loss and contaminated land) to enhance site potential and minimise future degradation;
- e. Encouraging the take-up of opportunities to improve resource efficiency in existing homes and buildings through retrofitting subject to the sensitivities identified in SP5; and
- f. Development should take advantage of linked opportunities in sustainable design and minimise conflict between different strands, notably through:
  - i. The biodiversity, pollution control and flood reduction benefits of surface water attenuation measures as per the SUDS hierarchy (see SC3);
  - ii. The temperature regulation and surface water attenuation benefits of biodiversity enhancements (see SC4);
  - iii. Avoiding conflict with air quality objectives (see SC5);
  - iv. The opportunity to integrate food growing, including consideration as a temporary use.

## 2. Spatial Strategy:

- a. Support implementation of the Thames River Basin Management Plan;
- b. Remediate gasholder sites for more beneficial use that would meet other aspirations of the plan;
- c. Improve opportunities for food growing, including through the protection and creation of allotments and other local growing space;
- d. Make best use of locally available energy sources (see SC2 and INF4); and
- e. Protect and enhance the 'green grid' (see INF6).



### 3. Design and technical criteria:

- a. Development will achieve at least the following standards, or equivalent standards within updated/replacement schemes:

Development Type	Scheme	Standard
All major applications* that are not solely residential new build	BREEAM UK New Construction or BREEAM UK Domestic Refurbishment / Non-Domestic Refurbishment and Fit-Out	Excellent
New build non residential and mixed use with over 500 sq.m GIA	BREEAM UK New Construction	Very good
Residential	London Plan Zero Carbon	As per policy SC2

\* As defined by The Town and Country Planning (Development Management Procedure) (England) Order 2015

- b. All development will incorporate water efficiency measures to achieve a consumption target of 105 litres or less per head per day (residential) or 'excellent' Wat 01 rating (non-residential development the subject of a BREEAM assessment);
- c. Where contamination is known or suspected, proposals will include adequate investigation of land contamination with remedial works agreed prior to the start of development. Reference to *CLR11 Model Procedures for the Management of Land Contamination* or subsequent updates should be made;
- d. Development should demonstrate that the risks of overheating have been addressed through design and construction choices, particularly in the case of high density and public realm schemes and in relation to energy and glazing solutions; and
- e. Landscaping schemes will demonstrate consideration of climate change effects through planting choices that are resilient to higher temperatures and scarce water supply.

For the purposes of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles

### Justification

- 6.147 This policy sets out the overarching principle of improving environmental resilience, whereby development will both protect the environment and become more resilient to it, particularly in respect of the impacts of climate change. While growth and change is recognised as necessary and in many respects, beneficial, development should avoid and minimise harm to the environment, incorporating mitigation where necessary and delivering improvements wherever possible. By the same token, development should

recognise the changing (and at times harmful effects of the) environment, and deliver increased resilience to the known effects of climate change and cumulative effects of environmental degradation. This includes, but is not limited to, resource scarcity; increased rainfall; higher temperatures; and air quality that falls below EU targets. The policy directly relates to the wider local resilience agenda, and while other policies in this Sustainability and Climate Change chapter address specific issues (energy, flooding and drainage, biodiversity and air quality), SC1 guides the cross-cutting use of these policies, ensuring that benefits to one issue / area are not at the expense of others. The policy contributes significantly to plan objectives, particularly in relation to good growth that delivers sustainable development without undue harm to the environment (objective 3), the creations of high quality places people value and feel safe in (objective 2), and harnessing the opportunities of development to improve existing issues (objective 1).

- 6.149 The changing climate presents challenges worldwide – however it is important that communities respond and adapt to these challenges at the local level. This will be achieved through applying the principles of sustainable development – or development that is less unsustainable.
  
- 6.150 Climate change is central to national and regional planning policy. The London Plan requires development to contribute to the mitigation of, and adaptation to, climate change and achievement of the Mayor of London’s carbon emissions target. In Newham, the highest standard of sustainable design will be required, in line with the London Plan.
  
- 6.151 Use of nationally recognised sustainable design and construction standards enables a transparent and robust, approach to improving the sustainability of development; as such, minimum BREEAM scheme standards are set out for different scales of non-residential development. In addition, given London’s status as a water stress zone with the picture only likely to worsen as result of population growth and global warming, a specific water efficiency target is applied to non-residential development as well as that already expected of residential development.
  
- 6.153a Given the history of land use in Newham, including heavy industry and utilities infrastructure throughout much of the borough, the situation today is that development must contribute to amelioration of previous environmental harm, not just the avoidance of further harm. Specific examples include the need to remediate gasholder sites (unusually prevalent in Newham) and the need to investigate and where necessary remediate ground contamination to avoid harm to groundwater sources. Water quality is specifically addressed by the Environment Agency’s Thames River Basin Management Plan, which transposes the principles of the EU Water Framework Directive to the local context and ensures consistency of response to water environment management across London and the UK.
  
- 6.153b Improving energy security through maximised use of locally available energy sources plays in to the Council’s wider resilience agenda, as does the prioritisation of local supply in other forms including food growing, labour, and other resources. As per the three strands of sustainable development, improving resilience overall is likely to have beneficial environmental, economic, and social effects.

## Implementation

- 6.153c As per Environment Agency advice, developers should recognise the need to investigate the risks of geohazards. Geohazards such as sinkholes are susceptible to climate change<sup>1</sup>, and the clay of the Thames Basin makes London particularly susceptible to 'shrink swell' effects<sup>2</sup> (whereby changes in temperature and the water table cause ground clays to shrink when dry and swell when hydrated). Geohazards are a significant but often unrecognised threat that can contribute to significant unexpected construction costs and substantial insurance losses. Developers are advised to refer to relevant data sources including the British Geological Society's 'Geosure' service<sup>3</sup> and seek Environment Agency advice if unsure of risks and impacts; periglacial features are known to exist at the site of the Olympic Velodrome and under Newham General Hospital.
- 6.153d London is known to suffer<sup>4</sup> from 'urban heat island' effects<sup>5</sup>, and improved insulation standards combined with energy solutions and access to daylight expectations means that overheating is a real problem in many modern buildings, particularly in the case of tall buildings and high density schemes. Developers are encouraged to make use of up-to-date research studies (for example from BRE<sup>6</sup>, WSP<sup>7</sup>, and the Zero Carbon Hub<sup>8</sup>); the most widely recognised industry guidance is CIBSE's *TM52: The Limits of Thermal Comfort: Avoiding Overheating in European Buildings*<sup>9</sup> which sets out advice for assessment and mitigation. Interventions may include use of green infrastructure and advanced materials such as coated glass but should be tailored to the conditions of the specific development.
- 6.153e Remedial works should be agreed and, where required, undertaken on all contaminated land prior to development. The specifics of gasholder remediation are discussed in INF4 paragraph 6.235j. Further to the guidance referenced within policy (3c), the investigation of contamination may also follow and reference relevant British Standards<sup>10</sup>. Note that the dewatering (draining) and water discharge that occurs during any construction process may need to be licenced by the Environment Agency<sup>11</sup>. And that the investigation of contamination is of particular importance within Source Protection Zones<sup>12</sup> (SPZs). Any development within SPZ-1 will be referred to the Environment Agency as these areas are used for the abstraction of water for human consumption. For more information (including locations) please refer to Environment Agency advice.

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<sup>1</sup> [Geohazard Information](#), Matt Harrison – p.10 [Earthwise 24](#), British Geological Society, 2007

<sup>2</sup> <http://www.bgs.ac.uk/futureThames/geohazards.html>

<sup>3</sup> <http://www.bgs.ac.uk/products/geosure/home.html>

<sup>4</sup> <https://data.london.gov.uk/dataset/london-s-urban-heat-island---average-summer>

<sup>5</sup> [https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/8/m/mo\\_pup\\_insert\\_health.web.pdf](https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/8/m/mo_pup_insert_health.web.pdf)

<sup>6</sup> <https://www.bre.co.uk/filelibrary/Briefing%20papers/116885-Overheating-Guidance-v3.pdf>

<sup>7</sup> <http://www.wsp-pb.com/GlobalIn/UK/Whitepapers/WSP-PB-Overheating-FINAL.pdf>

<sup>8</sup> [http://www.zerocarbonhub.org/sites/default/files/resources/reports/Overheating\\_in\\_Homes-Where\\_to\\_Start\\_Introduction\\_for\\_Planners\\_Designers\\_and\\_Property\\_Owners.pdf](http://www.zerocarbonhub.org/sites/default/files/resources/reports/Overheating_in_Homes-Where_to_Start_Introduction_for_Planners_Designers_and_Property_Owners.pdf)

<sup>9</sup> <https://www.cibse.org/Knowledge/knowledge-items/detail?id=a0q2000000817f5AAC>

<sup>10</sup> <https://shop.bsigroup.com/en/ProductDetail/?pid=00000000030362551>

<sup>11</sup> <https://www.gov.uk/guidance/water-management-abstract-or-impound-water>

<sup>12</sup> [http://maps.environment-](http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=531500.0&y=181500.0&topic=groundwater&ep=map&scale=5&location=London,%20City%20of%20London&lang=_e&layerGroups=default&distance=&textonly=off#x=539915&y=184940&lg=1,10,&scale=8)

[agency.gov.uk/wiyby/wiybyController?x=531500.0&y=181500.0&topic=groundwater&ep=map&scale=5&location=London,%20City%20of%20London&lang=\\_e&layerGroups=default&distance=&textonly=off#x=539915&y=184940&lg=1,10,&scale=8](http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=531500.0&y=181500.0&topic=groundwater&ep=map&scale=5&location=London,%20City%20of%20London&lang=_e&layerGroups=default&distance=&textonly=off#x=539915&y=184940&lg=1,10,&scale=8)

- 6.153f As per policy SC3, on-site management of water through sustainable urban drainage systems can include water saving elements in addition to minimising flood risk and improving run-off quality.
- 6.153g While Building Regulations ensure a minimum standard of sustainable design and construction in modern buildings; much of Newham comprises older development that will not have incorporated the same standards. While opportunities for retrofitting should be encouraged in order to equalise the quality of the built environment and minimise environmental impact across the borough, these should be weighed against conservation objectives, as heritage buildings may not be suitable for all interventions. For more information refer to the expectations of Successful Places policies (SP3 and SP5) as well as Historic England advice including *Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historic and traditionally constructed buildings*<sup>13</sup>.
- 6.153h Allotments and other local growing spaces should be part of the green infrastructure / open space offer on larger sites, existing spaces should also be protected, promoted and positively managed, including through enhancing / intensifying opportunities for food growing.
- 6.153i River basin management plans set out how organisations, stakeholders and communities will work together to protect and improve the quality of the water environment. Good water quality is essential for wildlife and business including recreation, leisure and tourism ventures to thrive. Measures relevant to the London Lea catchment and Roding, Beam and Ingrebourne catchment are set out in the Thames River Basin Management Plan<sup>14</sup> with more information available from the relevant catchment partnership<sup>15</sup>.
- 6.153j In relation to overheating, reference to guidance from recognised sources should be made, major residential schemes should conduct modelling that takes in to account climate change and is in line with relevant GLA and CIBSE guidance.
- 6.153k In relation to BREEAM requirements for all major applications that are not solely residential new build, this includes schemes that comprise change of use or refurbishment.
- 6.153l Water efficiency outputs should be provided at application stage to demonstrate compliance with policy requirement 3b, use of Part G's Water Efficiency Calculator (or subsequent updates) is encouraged.

## Monitoring

- 6.160a Certain aspects of this policy are easier to directly monitor than others. While a thorough overview of the impacts on, and effects of, climate change is beyond what is achievable, indicators that look at planning outputs (what consents and other investment influenced by the plan deliver or promise, via activity sampling) and outcomes logically affected by

<sup>13</sup> <https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

<sup>14</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/500548/Thames\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500548/Thames_RBD_Part_1_river_basin_management_plan.pdf)

<sup>15</sup> <http://www.riverleacatchment.org.uk/index.php/london-lea-home> and <https://www.thames21.org.uk/the-roding-beam-ingrebourne-catchment-partnership/>

planning and development, will be used as a proxy measure for the suitability and efficacy of the policy on the whole.

#### 6.160b Indicators

- i. SC-OP-1 Environmental Resilience:
  - a. Non-residential consents meeting required BREEAM standards. (No specific target but trends should be positive);
  - b. Water efficiency standards attained (no specific target, monitor in line with policy intentions);
  - c. Growing space achieved (no specific target, should be increasing);
- ii. SC-OP-6 Policy Use and Robustness (no specific target, monitor for expected use and ability to withstand appeal scrutiny);
- iii. SC-OUT-1 Resource Consumption - Water consumption per capita [no specific target, should be decreasing].

## SC2 - Energy & Zero Carbon

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles:

- a. All development will minimise and reduce carbon emissions by following the lean, clean, green energy hierarchy; all major development will meet London Plan zero carbon targets; and
- b. Energy planning should contribute to the Council's Resilience agenda in relation to costs and service level in the ongoing provision of energy.

### 2. Spatial Strategy:

- a. The development and expansion of decentralised energy networks (including low-carbon generation, storage and transmission infrastructure) will be a central component of the scale of growth within the Arc of Opportunity; and
- b. Development should be configured to maximise the use of natural and waste energy sources including sunlight/daylight and (where feasible) ground / air / water / waste heat, where otherwise acceptable in terms of environmental impacts.

### 3. Design and technical criteria:

- a. All development is encouraged to incorporate smart meter technology that allows occupants to monitor and manage their energy usage. Major development will be required to commit to carrying out post-construction audits demonstrating compliance with CO2 reduction targets and incorporate smart meters that deliver monitoring data to the Local Authority for a minimum period of 3 years post-occupation;
- b. Statements setting out how development complies with the above strategic principles and spatial strategy should be provided; all Major development should be accompanied by an Energy Strategy/Assessment that:
  - i. Conforms to latest GLA guidance (currently *Energy Planning – March 2016*<sup>1</sup>) and requirements/guidance concerning Zero Carbon;
  - ii. Prioritises connection to heat networks (where they exist or planned development is known) and confirms appropriate mechanisms will be put in place to ensure end customers are protected in respect of the price of energy and level of service provided;
  - iii. Provides for connection to heat networks in future where connection is not made prior to occupation (including detail of any required retrofitting);

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<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

- iv. Demonstrates compliance with air quality standards, including the emissions standards for renewable and low-carbon plant set out in London Plan guidance<sup>2</sup>; and
  - v. Confirms that the risks of overheating have been addressed through the design of the development, as per policy SC1.
- c. Developments connecting to heat networks will provide evidence of ongoing management mechanisms, ensuring end customers are protected in respect of the price of energy and level of service.

For the purposes of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles

### Justification

- 6.162 Addressing energy efficiency and the use of clean and renewable energy sources has benefits in relation to fuel poverty, local energy sufficiency and security, and greenhouse gas emissions. The scale of growth in Newham presents an opportunity to embed energy production and transmission within new development whilst also better addressing environmental impacts like resource depletion and air quality degradation. This policy contributes to resilience and good growth objectives by promoting energy efficiency (thereby reducing costly fuel use) and supporting local energy generation that is designed and managed according to local objectives including reliability, cost and minimising the harmful air quality and global warming impacts of certain energy generation technologies (objectives 1, 2 and 3).
- 6.163 Low carbon development is central to national and regional planning policy, the principles, spatial strategy, and design and technical criteria above transfer drivers to the local context. Efficient, affordable, reliable and environmentally beneficial energy solutions should be seen as central and beneficial to development, as opposed to additional burdens upon developers; indeed viability testing has shown that costs are readily absorbable when factored in at the design, which given the Pan-London approach, is increasingly typical.
- 6.163a In order to deliver the Zero Carbon targets of the London Plan, all development, including that which modifies existing buildings rather than being new-build, must play its part, and ensure that the performance is sustained. To this end, expectations around monitoring and the demonstration of compliance are set out for major development schemes.
- 6.163b Localised energy solutions will contribute to the overall resilience of Newham, bearing in mind the requirements of policy INF4 in relation to infrastructure sufficiency. Given the substantial natural or waste resources presented by water source heat, sunlight/daylight, and ground and air heat, and the potential for heat network development in growth areas across the Arc of Opportunity, the spatial strategy identifies locally available energy sources, seeking ~~seeks~~ to ensure developers exploit these resources / opportunities rather than ignore them in favour of easier, cheaper, and more traditional modes. However, this

<sup>2</sup> Appendix 7 of the April 2014 [Sustainable Design and Construction SPG](#) or subsequent updates

should not be at the expense of other environmental impacts on waterbodies for instance, (as per SC4) or in terms of over-heating caused (see Policy SC1).

## Implementation

- 6.163c The energy hierarchy is set out by London Plan<sup>3</sup> with implementation advice provided by the Sustainable Design & Construction SPG. All scales of development are expected to follow these principles, with responses scaled as appropriate.
- 6.163d Carbon reductions are expected to be delivered on-site as far as possible, shortfall will only be accepted where it can be demonstrated that the reduction targets are impossible to meet in full on site. In such cases, off-setting contributions will be expected in line with London Plan requirements.
- 6.163e All development should try to connect to heat networks given their efficiency, resilience, and environmental benefits. Reference should be made to the London Heat Map (showing where networks exist or are proposed). To demonstrate compliance with policy clause 1b and 3c, developers are encouraged to make use of recognised industry standards such as the Heat Trust scheme<sup>4</sup> or CIBSE's UK Code of Practice<sup>5</sup>. Schemes involving energy generation should demonstrate how the benefits are passed on to end users.
- 6.163f Where heat pumps and other energy generation or transfer technologies are employed, refer to the further requirements of INF4. Point 2b above means that use of innovative technologies will only be approved where environmental impacts can be shown to be acceptable (e.g. the effects water source heat pumps may have on the Blue Ribbon Network through or energy solutions that demonstrate no degradation of air quality).
- 6.163g Guidance on how smart meter data should be reported to the Council will be produced. Options are likely to include use of an approved software platform or manual provision of data in an agreed format, either way secured through planning obligation.

## Monitoring

- 6.167a The monitoring framework includes performance indicators upon which the relevance and efficacy of the policy will be assessed. Outputs relate to the achievement of Zero Carbon targets at design stage while outcomes, given the range of information sources available, will include monitoring of actual carbon reduction post-occupation and EPC ratings. The requirement of this policy to include automatic reporting from smart meters will improve the Council's ability to monitor the success of the policy.
- 6.167b Indicators
- i. SP-OP6 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny];
  - ii. SC-OP-X Energy & Zero Carbon:

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<sup>3</sup> Policy 5.2

<sup>4</sup> <http://heattrust.org/index.php/the-scheme>

<sup>5</sup> <https://www.cibse.org/knowledge/knowledge-items/detail?id=a0q200000090MYHAA2>



- a. Zero carbon at design stage in relevant consents [no specific target, should be increasing];
- b. Smart meter technology in consents [no specific target, should be increasing];

iii. SC-OUT-X Carbon reduction:

- a. Achievement of targeted carbon reduction in new-builds [target: in line with reduction committed to or more];
- b. Environmental Impact Rating (based on CO2 emissions) of newly lodged EPCs compared to London and national averages, (no specific target should be improving];
- c. Energy Efficiency Rating (based of fuel costs) of newly lodged EPCs compared to London and national averages, (no specific target, should be improving].

## SC3 - Flood Risk & Drainage

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles:

- a. Taking in to account all sources<sup>1</sup>, flood risk (the likelihood of flooding plus the severity of its impacts) will be reduced. Development will not increase flood risk to any location;
- b. Development and decision making will be informed by the Strategic Flood Risk Assessment (SFRA) and best available data<sup>2</sup>;
- c. Flood Risk Assessments will be provided in line with national requirements and should be prepared in accordance with SFRA and Environment Agency advice. Consultation and initial investigation should be commenced sufficiently early in the design and planning process so that all opportunities to reduce flood risk can be identified and maximised; and
- d. A presumption against impermeable hard-standing on domestic gardens and public open space.

### 2. Spatial Strategy:

- a. Development will be located in areas with the lowest risk of flooding, demonstrated via passing of the sequential test and, if necessary, exceptions test<sup>3</sup>. The sequential approach applies across the borough and within sites, such that areas of lowest risk should be identified and prioritised according to vulnerability of proposed use; and
- b. Development (including redevelopment of existing buildings and sites) will be set back 16m from tidal flood defences and 8m from river defences (see '*Indicative* TE2100 Flood Defence Buffering' on the Policies Map); in instances where no formal defences are present, development will be set back 8m from the top of the river bank.

### 3. Design and technical criteria:

- a. Proposals adjacent to flood defences must confirm, through liaison with the Environment Agency, that defence structures are in good condition and will provide protection for the lifetime of the development, with improvements made where necessary; this includes ensuring that the provisions of TE2100 can be met;
- b. Development in Flood Zone 2 or 3 should:
  - i. Create space for water;

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<sup>1</sup> Tidal, fluvial (rivers), rain (surface water), groundwater, sewer overflow, reservoir failure

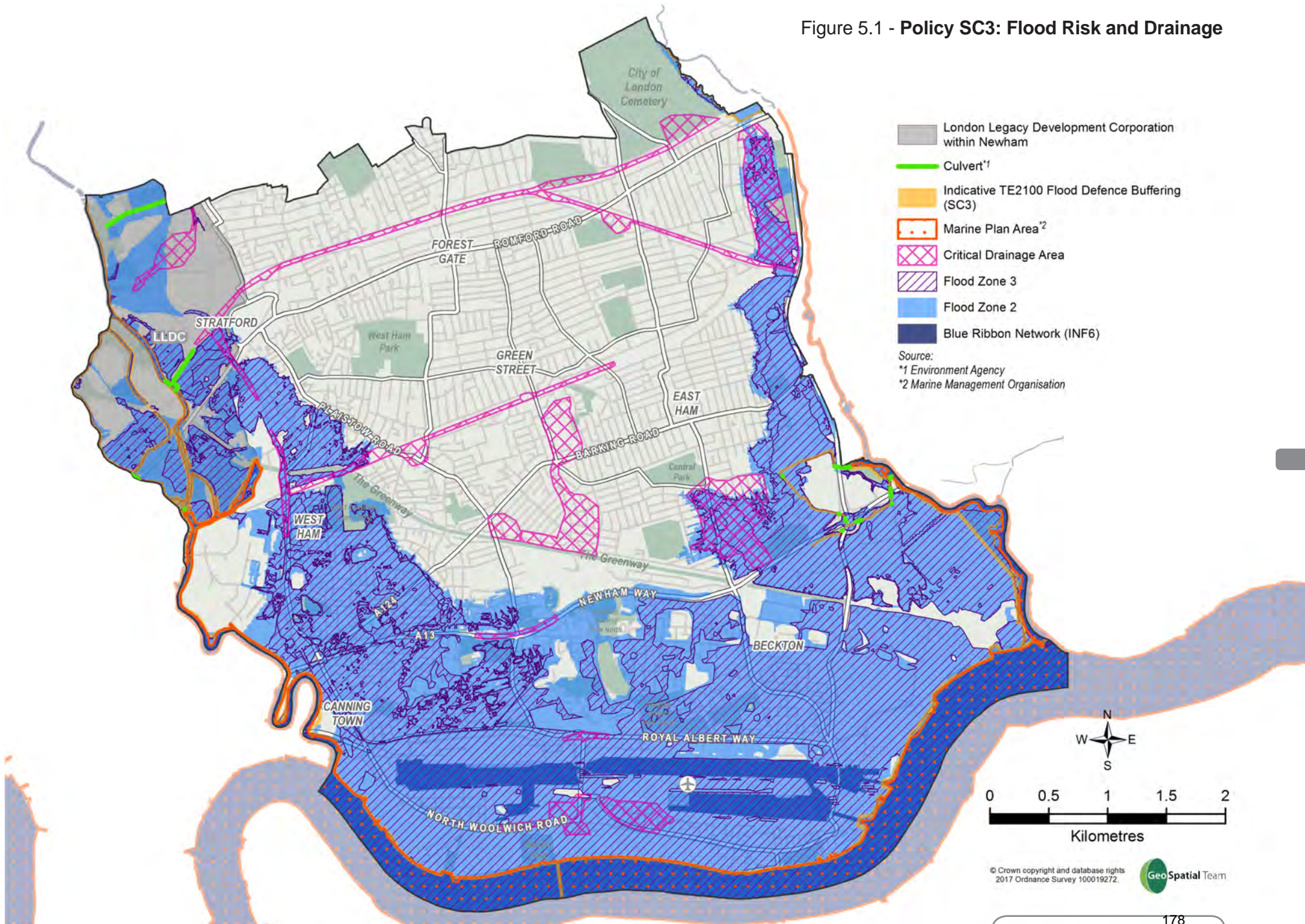
<sup>2</sup> This means the latest and most relevant information from the Environment Agency, which may include models more up-to-date than those used in production of the SFRA

<sup>3</sup> Guidance is set out nationally, via the NPPF and PPG

- ii. Be designed and constructed to be flood resilient;
  - iii. Locate vulnerable uses above ground floor level, whilst still delivering active, welcoming and functional street level design;
  - iv. Ensure all basement locations provide internal access and egress via floors no less than 300mm above the 1% annual probability flood level + allowance for climate change, or above the 2100 tidal breach flood level where the site is within the Thames tidal breach flood extent;
  - v. Ensure all 'more vulnerable', 'highly vulnerable' and 'essential infrastructure' uses have finished floor levels no less than 300mm above the 1% annual probability flood level + allowance for climate change; and
  - vi. Provide safe access/egress, such that occupants can reach Flood Zone 1 via public rights of way;
- c. All development should enable separation of foul and surface flows and incorporate Sustainable Urban Drainage Systems (SUDS) that reduce surface water run-off. All major development and any development falling within a Critical Drainage Area (CDA) should achieve Greenfield Run-off and be accompanied by a Surface Water Drainage Strategy that:
- i. Clarifies before and after development run-off rates and addresses water quality impacts, ensuring run-off is clean and safe;
  - ii. Follows the drainage hierarchy of the London Plan;
  - iii. Maximises the use of SUDS in accordance with the SUDS hierarchy (see SC1);
  - iv. Confirms the ownership, management and maintenance arrangements of any SUDS features;
  - v. Shows regard to the recommendations of Newham's Surface Water Management Plan (SWMP) and Local Flood Risk Management Strategy (LFRMS);
  - vi. Confirms, only where it can be demonstrated that site conditions prohibit the achievement of greenfield run-off, that a rate no higher than 3 times greenfield will be achieved; and
- d. Where culverted watercourses are present, opportunities for de-culverting should be investigated. Where de-culverting is not possible within the realities of a site, contributions to de-culverting elsewhere in the borough may be sought.

For the purposes of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Spatial Strategy

Figure 5.1 - Policy SC3: Flood Risk and Drainage





## Justification

6.169 Flood risk is recognised as a major issue for London; around 15% of the Greater London area is identified as a higher risk flood zone (tidal and fluvial sources, Flood Zones 2 and 3). That proportion rises to over 50% in Newham where the rivers Thames, Roding, and Lea comprise the southern, western, and eastern boundaries of the borough. The history of development in East London also means that most growth areas within the borough fall within those higher risk zones (i.e. the Arc of Opportunity, largely previously industrial land). Given the myriad benefits of growth and development, the need to meet national and regional growth targets, confirmation that Local Planning Authorities must respond to the risks of flooding (NPPF 102-104 and London Plan 5.12-5.13) and local residents' concern around the frequency and severity of street flooding, this policy seeks to ensure that development of all scales and in all locations is contributing to an overall reduction in flood risk. This policy contributes to most plan objectives as reducing flood risk through new development benefits the wider area (objective 1), the avoidance and minimisation of flooding is a key facet of high quality places in which people feel safe and secure (objective 2), and requirements ensure run off is not harmful to / at the expense of the environment (objective 3).

6.169a As 'flood risk' means not only the likelihood of flooding but the severity of its impacts, and as flooding can arise from a wide range of sources (tidal, fluvial, pluvial, groundwater, sewer overflow and reservoir failure) all development can contribute to reducing flood risk even where that need may not be immediately apparent. Climate change science means we know that rainfall and the likelihood of extreme weather events will increase, cumulative impact thinking demands that all scales of development contribute to improved resilience. The need to improve surface water drainage and become more resilient to flood damage ties into wider resilience agendas and is acutely important in an area with above-average levels of deprivation and rented accommodation (i.e. where individual and community-wide economic resilience to withstand and recover from flood damage will be lacking).

## Implementation

6.170 To understand and respond to possible flood scenarios in Newham, the Council has prepared a Strategic Flood Risk Assessment<sup>4</sup> (SFRA) endorsed by the Environment Agency. The underlying objective of the SFRA is to provide a means for consistent consideration of flood risk across the borough and for the duration of the plan. The SFRA provides mapping, definitions, flood defence and SUDS technique detail, and provides information in regard to all sources of flooding. It should be used by developers to inform all site-specific flood risk assessments (FRAs) and does some of the initial analysis work for newly designated Strategic Sites<sup>5</sup>. Use of the SFRA will be essential to enable a strategic and proactive approach to be applied to flood risk management, though it should be noted that where more recent hydraulic modelling has been published by the Environment Agency, best available data should be used. FRAs will be required in line with national criteria<sup>6</sup>; in November 2017 the requirement applied to all development within Flood Zones 2 and 3

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<sup>4</sup> [www.newham.gov.uk/SFRA](http://www.newham.gov.uk/SFRA)

<sup>5</sup> for Strategic Sites originally designated through the 2012 Core Strategy, an older SFRA may provide useful information and is available on request from the Local Plan team

<sup>6</sup> [www.gov.uk/guidance/flood-risk-assessment-for-planning-applications](http://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications)

and any development within Flood Zone 1 that covers more than 1 hectare or involves a change to more vulnerable use and is affected by sources other than rivers and the sea. Developers should note that as the policy requires no worsening of flood risk to any location, off-site impacts will be considered as part of the application process and should be addressed by FRAs.

- 6.171a In addition to the national guidance referenced within the policy, the SFRA will be useful in informing implementation of the spatial strategy, which applies the sequential approach both across the borough and within individual sites (2a). The sequential approach means development should be directed towards the areas of lowest risk, and land prioritised according to vulnerability. The SFRA begins to demonstrate how this is done for large scale sites while site-specific FRAs (where required) will inform the approach that should be taken with smaller sites.
- 6.172 Design and construction choices should aim to reduce the exposure of all new development to flooding and improve its resilience, thereby reducing reliance solely on the long-term maintenance of formal flood defences. Specific expectations for the design and construction of development within Flood Zones 2 and 3 are set out by part 3b of this policy, further context for these requirements can be found in the SFRA. It is additionally clarified by the Environment Agency that under-croft parking is not accepted as a form of flood water storage.
- 6.172a Development in the vicinity of rivers should note that flood defence structures often include underground elements such as anchors and tie rods; the 'TE2100 Flood Defence Buffering' line is indicative only and developers are responsible for investigating the status and nature of flood defences in consultation with the Environment Agency. The TE2100 Plan<sup>7</sup> sets out the Environment Agency's recommendations for managing tidal flood risk in the Thames Estuary up to the year 2100; while it makes recommendations about flood defence upgrades, riparian owners are primarily responsible for the maintenance and upkeep of defences. The purpose of riverside setbacks is not only to make 'space for water' (though the SFRA recommends it) nor an indication of planned and funded upgrade works, rather it is future-proofing to ensure the borough can continue to be protected from an increased risk of fluvial flooding. The setback can additionally contribute to character and amenity objectives around keeping rivers and riverbanks accessible (SP1, INF6, and INF7). Where the preferred level of setback is unachievable, current and future flood risk must be alleviated to the satisfaction of the Environment Agency and address the specific recommendations of the Thames Estuary 2100 Plan.
- 6.172b In addition to the loss of permeable ground surfaces that urbanisation typically brings, Newham has seen a particular loss in the quantum of grassed areas as people pave over private gardens or minimise maintenance costs by using hardstanding ground surfaces. Given the frequency, severity, and concern over surface water flooding, the expectation that permeable surfaces will be used as far as possible (and specifically in private gardens and public spaces) will be applied throughout the borough.
- 6.172c The wider use of sustainable urban drainage measures is considered a priority; to deliver a step-change in drainage capacity across the borough, a specific Surface Water

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<sup>7</sup> <https://www.gov.uk/government/publications/thames-estuary-2100-te2100>

Management Plan requirement is established. Given the multiple benefits of SUDS features, options should be weighed and chosen according to the following hierarchy:

<b>Most Sustainable</b>	<b>SUDS technique</b>	<b>Flood Reduction</b>	<b>Pollution Reduction</b>	<b>Landscape &amp; Wildlife Benefit</b>
	<b>Living roofs</b>	✓	✓	✓
	<b>Basins and ponds</b> - Constructed wetlands - Balancing ponds - Detention basins - Retention ponds	✓	✓	✓
	<b>Filter strips and swales</b>	✓	✓	✓
	<b>Infiltration devices</b> - soakaways - infiltration trenches and basins	✓	✓	✓
	<b>Permeable surfaces and filter drains</b> - gravelled areas - solid paving blocks - porous paviers	✓	✓	
<b>Least Sustainable</b>	<b>Tanked systems</b> - over-sized pipes/tanks - storm cells	✓		

Table 2: Taken from the Environment Agency's Development Control Thames Region document *SUDS – A Practical Guide* (October 2006)

Developers should refer to recognised guidance including that published by CIRIA<sup>8</sup> (The SuDS Manual C753), the GLA<sup>9</sup>/TfL<sup>10</sup> and Environment Agency<sup>11</sup>.

6.172d 'Greenfield' means the rate of run-off that would occur from a site in its undeveloped and undisturbed state. For calculation guidance refer to the DEFRA/EA report *Rainfall runoff management for developments (SC030219)* published October 2013. More recent calculation methodologies may be used provided they come from recognised (i.e. government or government-sponsored) sources.

6.172e Developers may need to pay attention to other Council requirements in regard to flooding<sup>12</sup>, specifically those of the Lead Local Flood Authority<sup>13</sup> as set out by the Local Flood Risk Management Strategy<sup>14</sup>. Examples of how the quality of run-off requirements above may be implemented include the LFRMS best practice advice regarding pollutant loads (i.e. percentage reductions of specified pollutants). Where other measures are employed, reference to recognised guidance should be made. If further advice from the LLFA is needed this should be pursued through the pre-application and planning application process.

6.172f As per Thames Water advice, the separation of foul and surface water flows must be made possible. Where only combined sewers are present, this means that development must incorporate the means to separate flows as sewer upgrades are made over time.

<sup>8</sup> [https://www.ciria.org/Resources/Free\\_publications/SuDS\\_manual\\_C753.aspx](https://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx)

<sup>9</sup> [https://www.london.gov.uk/sites/default/files/lislap\\_december\\_2016.pdf](https://www.london.gov.uk/sites/default/files/lislap_december_2016.pdf)

<sup>10</sup> <http://content.tfl.gov.uk/sustainable-urban-drainage-november-2016.pdf>

<sup>11</sup> [http://www.rtpi.org.uk/media/12399/suds\\_a5\\_booklet\\_final\\_080408.pdf](http://www.rtpi.org.uk/media/12399/suds_a5_booklet_final_080408.pdf)

<sup>12</sup> <https://www.newham.gov.uk/Pages/Services/Flooding.aspx>

<sup>13</sup> <https://www.local.gov.uk/topics/civil-emergencies/flooding/local-flood-risk-management/managing-flood-risk-roles-and>

<sup>14</sup> <https://www.newham.gov.uk/Documents/Environment%20and%20planning/FloodRiskManagementStrategy.pdf>

6.172g As per Environment Agency advice, deculverting of waterways is supported in principle given the potential environmental benefits (for biodiversity, water quality, and flood water storage) but suitability of deculverting should be investigated on a case by case basis. In many instances culverts may be of sewers and deculverting could lead to significant losses in usable land.

## Monitoring

6.177a Monitoring the efficacy of this policy will primarily include analysis of the treatment of flood risk and drainage requirements within planning consents; indicators cover Environment Agency objections, rates of run-off set-back from flood defences, (all are as-at design stage as monitoring in-operation would be unfeasible). While monitoring the real world outcomes of these approaches is much more difficult, the Lead Local Flood Authority has an existing responsibility to investigate and report on surface water flood events. This source will be drawn upon to try to determine whether the Local Plan should be doing more in certain areas of the borough.

### 6.177b Indicators:

- i. SC-OP6 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny];
- ii. SC-OP3 Managing Flood Risk:
  - a. Planning permissions granted contrary to EA flood risk advice [Target is zero though occurrences should be examined to determine whether conditions have overcome concerns];
  - b. Major consents and those in CDAs delivering Greenfield runoff [No specific target but positive trends should be observed];
- iii. SC-OUT-x
  - a. Frequency and severity of surface water flood events;
  - b. Properties significantly affected by flood events [where properties were consented under the current Development Plan, issues should be further investigated].



## SC4 - Biodiversity

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles:

- a. Biodiversity, including aquatic and riparian habitats, will be protected and enhanced, with all ~~and~~ development ~~will~~ contributing to the achievement of a net gain, and where compatible, improvements to access to nature;
- b. Permitting development only where it can be demonstrated that significant adverse impact on protected species and habitats is avoided; and
- c. Water quality will be protected and enhanced, with development contributing to achievement of River Basin Management Plan objectives wherever relevant.

### 2. Spatial Strategy:

- a. Trees subject to TPOs, European Sites (notably Epping Forest SAC), and Sites of Importance for Nature Conservation (SINC) (see INF6 and Appendix 3) will be specifically protected, having regard both to direct and indirect impact pathways; and
- b. As per INF6, habitat connectivity and access to nature will be promoted through the extension of the green grid.

### 3. Design and technical criteria:

- a. Where any disturbance to or removal of trees is required, replacement will be expected;
- b. Any development that creates one or more residential unit or pertains to 500 sq. m or more GIA of any non-residential use should be accompanied by a Biodiversity Statement that:
  - i. Demonstrates the opportunity to enhance biodiversity has been maximised, including through the provision of soft landscaping and the management of non-native invasive species on the site;
  - ii. Demonstrates how the development protects connectivity between habitats and avoids (or mitigates) impacts upon existing trees, hedging, soft landscaping, and other biodiversity features;
  - iii. Sets out technical detail in relation to the efficacy of green roofs, specifically depth and variation of substrate;
  - iv. Addresses potential need for a Water Framework Directive compliance assessment and relevant management of direct or indirect impacts on the ecological and chemical value of a waterbody;

- v. Incorporates, where required, a Habitats Regulations Assessment (in accordance with the Strategic Site allocation or policies INF7 or SC5) which considers direct and indirect impact pathways and in-combination and cumulative effects on the Epping Forest SAC;
- vi. In the case of Major developments, uses recognised biodiversity accounting technologies to demonstrate how biodiversity net gain is delivered; and
- vii. Set outs proposals for off-site mitigation via payments in lieu to a relevant provider where either net gain is impossible to achieve on site due to conflicts with the safe operation of transport and utilities infrastructure, or off site impacts on European sites are likely.

For the purposes of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles

### Justification

- 6.179 The biodiversity duty<sup>1</sup> requires all public authorities to have regard to conserving biodiversity within policy and decision-making. Development and growth will put pressure on existing species and habitats within the Borough and potentially beyond it, but also provide an opportunity to improve the conditions for biodiversity. Newham, despite its urban structure and proximity to central London, supports a diverse array of wildlife, including species that have adapted their behaviours to urban environments. Development brings opportunities to enhance biodiversity and address past degradation, including that resulting from previous contaminative uses, dated methods of flood risk management, and a tendency to pave over garden space. The policy contributes to good growth (objective 3) and the creation of high quality places (objective 2).
- 6.180 The degradation and destruction of wildlife habitat is a major factor leading to the decline of biodiversity. To effectively tackle biodiversity loss existing habitats must be safeguarded (through protection and enhancement), and the overall extent of habitats must be increased (through the creation of new areas and their ongoing management). To this end, the potential for both direct and indirect (i.e. off-site) cumulative and in-combination impacts of a development on biodiversity will need to be assessed. Off-site impacts can occur through ecological pathways such as disruption to habitat connectivity, or runoff that affects water quality together with effects generated by movement patterns (including impacts on air quality or of increased recreational use).
- 6.181 While by no means the only indicator of biodiversity value, the Local Plan protects 575.96 hectares of green space (14.93% of the overall borough); a subset of these spaces as well as the rivers and docks are also designated Sites of Importance for Nature Conservation (SINCs) – amounting to 16.92% of the borough area. Based on data collected and shared by Greenspace Information for Greater London (GiGL), details of Newham's SINCs can be found in Appendix 3 attached to INF6. Notable examples include the rivers Thames, Lea,

<sup>1</sup> From the Natural Environment and Rural Communities Act 2006, see <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>

and Roding (metropolitan importance) and Royal Docks, Beckton District Park, Greenway, East Ham Nature Reserve, and various cemeteries (borough importance). In addition, Newham is within reasonable proximity to Epping Forest SAC and Walthamstow Marshes SSSI (part of the Lee Valley SAC).

6.182 Sites not necessarily recognised for their biodiversity offer may include habitats and species of value (brownfield land for example, often in heavily developed or growth areas within the borough), as such the principle of net gain (and standardised assessment of net gain) is introduced to ensure all opportunities for biodiversity conservation are taken up.

6.182a The London Plan incorporates a principle of improving access to nature; as such, increasing public access to SINCs, the green grid, and Blue Ribbon Network is supported (see policies INF6 and INF7) where the avoidance of harm to biodiversity can be demonstrated.

## Implementation

6.183 Planning applications should demonstrate how development proposals avoid adverse impacts on biodiversity and address the principles, strategy, and criteria set out above. Demonstrations of net-gain should use the tools and methodologies of recognised sources, including the 2016 CIRIA / CIEEM / IEMA document 'Biodiversity Net Gain – Good practice principles for development'<sup>2</sup> and DEFRA's Biodiversity Metric<sup>3</sup> or subsequent updates (note that offsetting is only accepted as a last-resort but the metric<sup>4</sup> provides a useful system of valuation).

6.183a Assessment of biodiversity impacts will include consideration of all species present on site, including building-based birds and bats. For details of protected species refer to national guidance<sup>5</sup>. GiGL holds records of where recorded in Newham. As the information held by GiGL is maintained through a network of partners, developers and residents are encouraged to submit biodiversity reports via its website<sup>6</sup>.

6.183b The Council will work together under the auspices of Duty to co-operate and generally with Natural England and other authorities<sup>7</sup> in reasonable proximity to the Epping Forest SAC to improve the understanding of indirect in-combination and cumulative impacts of development on the SAC (notably in relation to air quality and recreational intensity) and, as necessary, monitor these and work towards a strategic solution, if required. Any HRA required in respect of any development proposal should have regard to the output of this on-going exercise.

6.183c Proposals should take account of the requirements of the Thames River Basin Management Plan<sup>8</sup> (see relevant catchment measures) and avoid any deterioration of waterbodies.

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<sup>2</sup> [https://www.cieem.net/data/files/Publications/Biodiversity\\_Net\\_Gain\\_Principles.pdf](https://www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf)

<sup>3</sup> <https://www.gov.uk/government/collections/biodiversity-offsetting>

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69531/pb1374\\_5-bio-technical-paper.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69531/pb1374_5-bio-technical-paper.pdf)

<sup>5</sup> <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>

<sup>6</sup> <http://www.gigl.org.uk/submit-records/>

<sup>7</sup> Some of whom are working together under a Memorandum of Understanding entitled Managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation

<sup>8</sup> <https://www.gov.uk/government/collections/river-basin-management-plans-2015#thames-river-basin-district-rbmp:-2015>

Wherever possible, provisions to enhance water quality should be incorporated. Useful information may be available via Catchment Partnerships<sup>9</sup> or the Environment Agency's Catchment Data Explorer<sup>10</sup>.

- 6.183d Biodiversity net gain should be delivered within the application site as far as possible. Where this cannot be accommodated for operational or other reasons a payment in lieu to a relevant provider should be established and secured via planning obligation. In the first instance the onus is on the applicant to mitigate the impacts of the proposed development, this development cost should be embedded within delivering a policy compliant scheme. This would include contributions to any necessary mitigation of in-combination significant effects on Epping Forest SAC by way of a 'Strategic Solution' which may emerge from the investigation work currently underway.

## Monitoring

- 6.185a Given the impossibility of conducting borough wide biodiversity audits on a consistent basis, indicators identified are used as proxy measures for biodiversity trends and the efficacy of this policy. Outputs will focus on biodiversity changes delivered through consents, while outcomes will draw on data provided by GiGL, London Invasive Species Initiative and the Environment Agency<sup>11</sup>, as proxies, in the absence of capacity to undertake more comprehensive surveys.

### 6.185b Indicators

- i. SC-OP4 Protecting and enhancing biodiversity:
  - a. Biodiversity enhancements to be delivered as part of major consents [no specific target, monitor for proportionate commitment to policy objective];
  - b. Changes in areas of biodiversity importance [Target: No net loss of SINC or tree subject to TPO from planning];
- ii. SC-OP6 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny];
- iii. SC-OUT-4 Biodiversity:
  - a. New reports of invasive species (LISI) or protected species (GiGL);
  - b. River water quality [No specific target, should be improving in line with broader London trends where data is available].

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<sup>9</sup> <https://www.thames21.org.uk/a-new-approach-to-catchment-management/>

<sup>10</sup> <http://environment.data.gov.uk/catchment-planning/search?type=postcode&q=e16%202qu>

<sup>11</sup> <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/6>

## SC5 - Air Quality

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles:

- a. All development should be at least air quality neutral, supporting a net decrease in specified pollutants and making design, access, energy, and management decisions that minimise air pollution generation and exposure at demolition, construction, and operation stage; and
- b. Development will support implementation of Newham's Air Quality Action Plan, ensuring identified actions and mitigation are incorporated where relevant.

### 2. Spatial Strategy:

- a. Development along major roads or in other locations that experience air quality exceedances should be configured to improve the dispersal of identified pollutants and reduce exposure without compromising SP7 objectives; and
- b. Development close to navigable waterways should maximise use of waterborne freight and waste movement during construction and operation.

### 3. Design and technical criteria:

- a. Air quality neutrality should be demonstrated using methodologies set out by the London Plan and related guidance;
- b. All major development should detail how it aligns with the Mayor of London's Control of Dust & Emissions during Construction & Demolition SPG<sup>1</sup> or subsequent updates;
- c. Waste facilities and other dust and emissions generating uses should be fully enclosed or provide an equivalent level of environmental protection with respect to air emissions;
- d. Developments should only deploy combustion based energy sources (including CHP, biomass boilers, and wood-burning stoves) as a last resort; those that do should demonstrate use of low-emission plant and post process mitigation/treatment where necessary to avoid an increase in controlled pollutants; and
- e. Developments likely to generate any significant traffic, and hence air quality impacts, on the A12 and A406 (whether alone or in combination with other development) which pass within 200m of the Epping Forest SAC will need to undertake an assessment of impact on the SAC as part of the HRA.

For the purposes of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles

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<sup>1</sup> [Control of Dust & Emissions During Construction & Demolition SPG](#)

## Justification

- 6.185 London's air quality falls below recommended standards<sup>2</sup> with particulate levels, black carbon, nitrogen oxide, and ozone known to have significant effects on human health<sup>3</sup>. Concern over the issue has grown in recent years, as illustrated by regional research<sup>4</sup>, national consultation<sup>5</sup>, and engagement feedback from Newham residents. The fact that air quality is one of the few environmental issues people are moved to comment on is testament to its harmful health and amenity impacts and justifies a Local Plan response that seeks to ensure all development considers impacts to, and risks associated with, air quality. With air quality such an integral part of quality of place, this policy contributes to multiple plan objectives including the creation of healthy places people choose to live and work in (objective 2), good growth and the avoidance of environmental degradation (objective 3), and using the opportunities presented by new development to address existing issues, to the benefit of all (objective 1).
- 185ai Given the sensitivity of the Epping Forest SAC to air quality, it is considered that any development likely to give rise to significant traffic generation on the sections of the A12 and/or the A406 which fall within 200m of the SAC will be likely to require assessment pursuant to the Conservation of Habitats and Species Regulations 2010. A development may give rise to such traffic generation alone or in-combination with other development.
- 6.185a At the regional level, the issue of air quality is central to the Mayor's Environmental Strategy which sets out that Local Authorities should use the planning system to reduce pollution from new development, encourage shifts to zero and low emission modes of transport, and promote the use of green infrastructure and vehicle restriction to mitigate impacts. The strategy confirms that there are serious air quality implications in the use of Combined Heat and Power (CHP) Plants / Biomass Boilers and that as the traditional grid moves toward decarbonisation, the benefits of CHP may no longer outweigh the harm. This should complement the introduction of the Ultra-Low Emissions Zone (ULEZ) and the Toxicity Charge (T-Charge) to try and deliver air quality improvements<sup>6</sup>.
- 6.185b Climate change effects are such that as temperatures increase, air quality will worsen and the effects of poor air quality will increase. The issue is urgent and all development must respond. Given the scale of growth in Newham, the borough has and will continue to see high levels of demolition and construction activity, processes that pose particular threats to air quality due to their generation of dust (particulates).

## Implementation

- 6.185c Air quality neutral assessment methodology is explained in the GLA's Sustainable Design and Construction SPG though subsequent updates should be used if available. Part of an air

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<sup>2</sup> <https://www.theguardian.com/environment/2017/oct/04/revealed-every-londoner-breathing-dangerous-levels-of-toxic-air-particle>

<sup>3</sup> <http://www.telegraph.co.uk/news/earth/environment/11991350/Mapped-Where-is-air-pollution-killing-the-most-people.html>

<sup>4</sup> <https://www.london.gov.uk/press-releases/mayoral/londoners-poll-air-pollution-is-at-crisis-levels>

<sup>5</sup> <https://www.gov.uk/government/news/new-air-quality-plan-published-for-consultation>

<sup>6</sup> <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/your-views-how-can-we-clean-our-air>



quality neutral assessment is that no development should create new areas of air quality exceedance (i.e. where the limit values of national standards are exceeded).

- 6.185d The principles of minimising exposure to poor air quality are of particular importance in 'sensitive receptor' uses, i.e. where vulnerable user groups are present (schools, health facilities, older peoples and other forms of specialist housing), but also protected habitats and species. The potential impact of development on the Epping Forest SAC would be expected to be considered as part of the HRA process to accompany any planning application where required<sup>7</sup>. That HRA process should have regard to all relevant information available, including the output of any current investigation of in-combination and cumulative impacts on the Epping Forest SAC.
- 6.185e The principles of using the design of structures and road networks to improve dispersal rates are of particular importance to polluting uses (bus and taxi locations, some waste and industrial uses) and along the principal road network. Solutions, for example in the orientation and massing of buildings, should seek to maintain a coherent street form as per SP7 requirements.
- 6.185f For the purposes of this policy, 'fully enclosed' means walls and roof, the assessment of 'equivalent environmental protection' should be done in liaison with Environment Agency licencing teams. The requirement applies to both permanent and temporary use permissions but is not applied to demolition and construction activities alone. It is clear from part 1a of this policy that such processes should still consider air quality and incorporate measures to minimise and mitigate impacts, though it would not be feasible to assess delivery of 'equivalent environmental protection' with respect to emissions.
- 6.185g National and regional air quality requirements will be applied; where policies that are more up-to-date than Newham's Air Quality Action Plan give conflicting advice, preference will be given to latest guidance and recommended actions.
- 6.185h As per the cross-cutting approach of this Local Plan, the air quality expectations of this policy align with other policy expectations that promote the use of low and zero emission transport modes. Reference to relevant policies should be made, specifically INF2 Sustainable Transport.
- 6.185i Given the conflict between some forms of energy generation and air quality objectives, all developers should refer to the requirements of SC2, ensuring that combustion based energy is employed as a last resort and accompanied by adequate minimisation and mitigation of impacts (including meeting the benchmarks set out in Appendix 7 of the Sustainable Design and Construction SPG). Developments will be expected to focus on energy efficiency and an efficient energy supply before energy generation solutions known to have negative air quality impacts are considered.

## Monitoring

- 6.185j The Local Authority has existing air quality reporting obligations under the London Local Air Quality Management Framework<sup>8</sup>; the reports, produced by the Environmental Health

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<sup>7</sup> The potential need for HRA is flagged in the Strategic Sites schedule (Appendix 1)

<sup>8</sup> <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>

team, will be drawn upon to help assess the relevance and success of this policy. Monitoring stations around the borough provide relevant data and significant developments in areas of exceedence, or which generate harmful air quality impacts, may be required to incorporate dedicated monitoring apparatus.

6.185k Indicators

- i. SC-OP6 Policy Use & Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny];
- ii. SC-OP5 Unresolved EA/Environmental Health consultee air quality objections in approvals [no specific target: should be minimal];
- iii. SC-OUT-X Air quality exceedences (No specific target but positive trends should be observed in line with the AQMA).



# INF1 Strategic Transport

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

## 1. Strategic Principles and Spatial Strategy:

- a. Major physical barriers to movement will be overcome without having an unacceptable impact on residents, development/regeneration potential or existing service users; and
- b. Secure investment in, and the ongoing safe and viable operation of strategic transport networks that will leverage investment and regeneration into Newham and help achieve modal shift to sustainable transport, further integrating the borough with the rest of London;

This includes but is not limited to the following interventions that benefit connectivity, accessibility, efficiency and/or journey time reliability:

### Rail

- i. Elizabeth Line service including stations at Stratford, Maryland, Forest Gate, Manor Park and Custom House (T1), plus enhancements to meet growth demands and potential for Crossrail 2 Eastern Branch;
- ii. International trains calling at Stratford International station and /or, depending on capacity, linkages from Stratford (T2) to the possible Crossrail 2;
- iii. Increased capacity and service enhancements on main line railway services serving the borough, notably between the Upper Lee Valley and Stratford (T3);
- iv. Increased capacity and extensions to the network on the orbital rail system (London Overground) (T4);
- v. Station capacity enhancement notably at Stratford and West Ham, and step-free access at all stations in the Borough – particularly East Ham, Plaistow and Upton Park (T5);
- vi. Enhancements to the DLR network and further extensions including to Barking and Thamesmead, new stations at Beckton Riverside and Thames Wharf (T6) and an expanded depot at Beckton Riverside;
- vii. Measures to improve local usage of the cable car as a transport link (T7);

### Bus

- viii. Enhanced bus links from the Royal Docks across the River Roding and East London Transit from Beckton to Barking Riverside (T8);
- ix. Other strategic bus network enhancement including interchange and new service infrastructure particularly along Key Corridors and to Strategic Sites, improved north-south connectivity, and measures to protect journey time reliability (T9);

### Cycle and pedestrian

- x. Extensions and upgrading of the Strategic Cycle Network and other key cycling routes including Cycle Superhighways and Quietways, notably support for enhanced access to and increased use of the Greenway (T10) and an enhanced walking and cycling network in the Royal Docks, including North Woolwich Road and to and along the river and dock edges;
- xi. High quality modal interchange facilities for cyclists, including cycle hire facilities, notably in the Royal Docks, Stratford, Forest Gate and Manor Park;
- xii. Extensions to the strategic footpath walking network including the Leaway and Roding Valley walkways and associated inter-borough/cross river connections (T11);

### Road/bridges/tunnels

- xiii. Re-modelling of the Stratford Gyratory and other Key Corridor improvements, including public realm enhancements, particularly in the Royal Docks along North Woolwich Road from Tidal Basin to North Woolwich Roundabout, and longer term, Woolwich Manor Way from North Woolwich to Albert Island (T12);
- xiv. River crossings (as safeguarded or revised), delivered as part of a package(T13) to improve accessibility, connectivity and resilience of sub-regional transport networks;

### Navigation

- xv. Re-activation, relocation, and/or consolidation of Thameside West safeguarded wharves, notably at Peruvian Wharf (T14a) and Royal Primrose Wharf (T14b), subject to Policy J2;
- xvi. A strategic boatyard at Albert Island supporting passenger movement on the Blue Ribbon Network (T15);
- xvii. Other proposals to encourage the improvement and use of Newham's navigable waterway network including freight transfer facilities, locks and winding holes, passenger and leisure transport facilities, piers and moorings in appropriate locations (T16);

### Air

- xviii. Measures to support the optimisation of airport capacity, including access (potentially via a new Elizabeth Line station) and other freight and passenger facilities (T17); and

### Operational safeguarding

- Xix Safeguarding the role and operational function of the following transport infrastructure as indicated on the Policies Map as part of the strategic transport network unless agreed to be surplus to requirements of the relevant operators/strategic authorities:-
  - a. Radar stations and sightlines, (T18);

- b. Rail, (including DLR and Tube, (T5)) bus and cable car (T7), station lines and depots (T20, LILs & SIL);
- c. Protected mooring points and public river access points (T19);
- d. safeguarded wharves and their access requirements (T14a/b); and
- e. London City Airport (via its Airport Safeguarding Area (T17a) and Public Safety Zone (T17b).

Where appropriate, these transport proposals are included on the Policies Map.

## 2. Design and technical criteria:

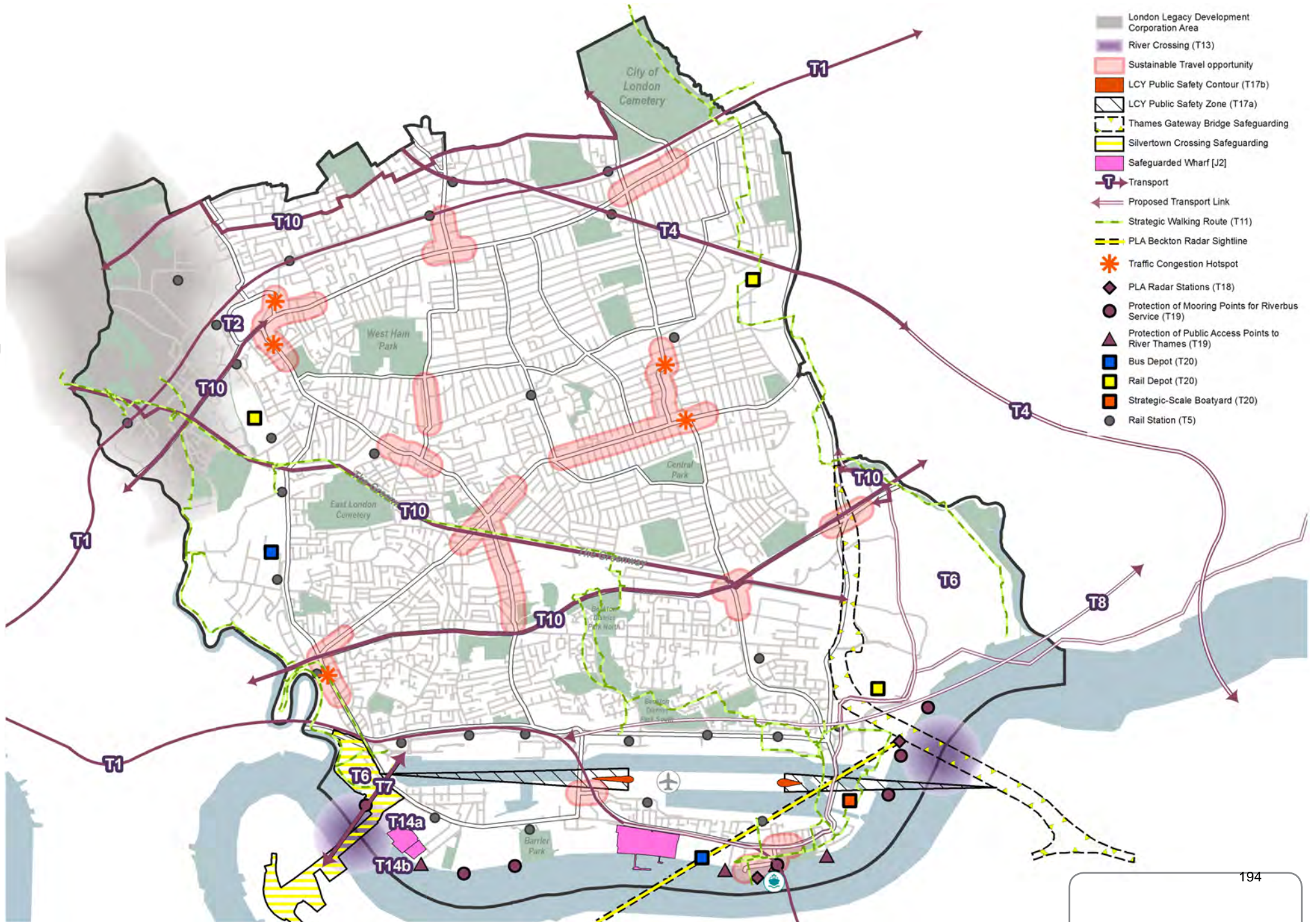
- a. Proposals for strategic transport projects should demonstrate, where relevant through options appraisal, that the favoured scheme, including mitigation measures where necessary, is the most appropriate in terms of minimising negative social, economic, spatial and environmental impacts; costs; and technical feasibility; and
- b. All development should ensure that it is compatible with the spatial and environmental impacts of the ongoing viable operation of transport infrastructure in line with policies SP2, SP3 and SP8. This includes the requirement that uses including residential, which draw in large numbers of people to the Public Safety Zone compared with the present situation, should be avoided in line with policies SP9 and SP2 and that the requirements of safeguarded alignments are compiled with liaison with TfL.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles and Spatial Strategy.

## Justification

6.187 A key component of the Council's overarching objectives is to connect people to opportunities arising from development, deliver Good Growth and to support an overall shift to a more sustainable pattern of movement in Newham. Newham's ongoing regeneration, including its convergence with neighbouring boroughs and with London as a whole, and its attractiveness for inward economic investment, are dependent to a large degree upon excellent strategic accessibility, and the ongoing ability to safely and easily move goods and people around the borough and beyond without delay. Substantial investment has already taken place in recent years, including Elizabeth Line access at five stations, (due to open in 2018, improvements to the Borough's Tube service (including night tube on the Jubilee Line), the introduction of Cycle Superhighways and creation of the Leaway, and substantial capacity enhancements and rolling stock renewal and extensions of the Docklands Light Railway. Significant investment is also underway in re-modelling the Stratford Gyratory, upgrading the Greenway, further Leaway connections, and to improve passenger handling capability at London City Airport.

Figure 6.1 - Policies INF1 and INF2: Transport Map





- 6.188 This investment contributes to the wider objective of Convergence, allowing the Arc of Opportunity to become an attractive location for investment as one of the best-connected parts of Greater London. However, it is also the case that strategic transport investment is not without negative impacts, which can include noise and disturbance, deterioration of air quality, the creation of new barriers and land blight particularly during protracted safeguarding periods, opportunity costs (e.g. other potential land uses/forms of place-making) and increased journey times for some, affecting residents, businesses and wider regeneration and development potential. These need to be acknowledged, addressed as far as possible at the design stage, preferably designing them out or at least mitigating them, and where persisting after this, carefully assessed and weighed up in assessing the acceptability of a scheme. Equally however, as per 'Agent of Change' principles, the policy acknowledges that other development that may bring land use conflicts with existing transport infrastructure, and as such needs to be designed to ensure that these are adequately mitigated and do not impinge on the safe and viable operation of strategic transport links.
- 6.189 Therefore, subject to this approach, this policy supports ongoing, programmed and future investment in the strategic transport network to assist the borough's ongoing regeneration and to stimulate inward investment and to secure an overall high quality transport service for Newham's residents and businesses, recognising, as per the Mayor's Transport Strategy (2018) that a 'do nothing' approach is inappropriate in light of significant growth, and already significant air quality and congestion impacts, with the particular need to achieve modal shift. Support will also be given to other, currently unfunded, strategic transport proposals that will contribute towards Newham's regeneration and economic and physical development. The IDP, spatial policies and policies SP2, INF2, J1, J2 and J3 set out further detail on the need, progress and role of these different types of strategic transport interventions, which ultimately need work together as part of a package by mode (this is particularly the case with road based river crossings) and overall to secure the best effects.

## Implementation

- 6.204 The Council will continue to work with neighbouring authorities, Transport for London (TfL), the Port of London Authority (PLA), London City Airport, developers, the Canal and River Trust and Network Rail to secure the delivery of strategic transport projects; in the case of developers this requirement will be in addition to addressing on site access issues. It will be expected that this process and associated design and Environmental Statements should result in the clear articulation of the different environmental and spatial impacts of the proposals (with particular reference to spatial policies S2-6 and thematic policies SC1-5, SP5, INF6&7 and INF2), and refinement of options and mitigation accordingly. Given that some strategic transport developments will result in changes in traffic distribution, where relevant, this should include screening of developments for in combination SAC impacts as per the Local Plan HRA and HRA guidance.
- 6.205 The Infrastructure Delivery Plan (IDP) identifies the types of infrastructure required to support the delivery of the plan. The IDP sets out the anticipated timing and phasing of the infrastructure provision and will depend on the when development is likely to come forward and the availability of funding and timing of development.

- 6.206 The Local Implementation Plan sets out a programme for funding and delivery of strategic and local transport schemes. The borough will be required to produce and update LIP3 documents in September 2018.
- 6.206a Development proposals that may impact either the operation and/or safety of London City Airport (LCY), navigable waterways and safeguarded wharves and public transport infrastructure, together with safeguarded new transport infrastructure alignments/corridors (river crossings) or utilities infrastructure, notably Beckton Sewage Treatment Works, should be discussed with the relevant consultees including, TfL, PLA<sup>1</sup>, Civil Aviation Authority (CAA), London City Airport and Thames Water at the earliest possible stage to ensure the relevant safeguarding measures are implemented. Mapping available on the Council's website<sup>2</sup>, and on the Policies Map (radar sightlines, mooring points and river access points) denotes relevant safeguarding/referral requirements but should not be the sole resource for understanding safeguarding requirements given the complex and technical nature of these matters. In addition, all noise-sensitive developments within designated Full Use London City Airport Noise Contours<sup>3</sup> should comply with recommended internal noise levels and ventilation standards, and in the case of major applications also summer overheating prevention standards, as specified in the most up to date building regulations<sup>4</sup>.
- 6.206b Whilst proposals to encourage use of the borough's navigable waterways for various forms of transport are supported the context for the development of new water transport facilities will be taken into account when determining the appropriateness of new water transport uses. For example, in areas with a context of employment uses, viable waterborne freight uses may be given preferential support over proposals to provide moorings for leisure craft. In relation to wharf consolidation and reactivation (policy J2), the Council will work with its partners including the PLA and GLA to secure the release of Sunshine, Manhattan and Thames wharves in the Royal Docks that are currently safeguarded upon their consolidation/relocation within Central Thameside West.

## Monitoring

- 6.206c The monitoring framework includes specific performance indicators relating to strategic transport progress upon which the relevance and efficacy of Policy INF1 will be assessed. Outputs relate to key milestones for strategic transport supported in planning, regeneration and through complementary measures and will be drawn from general activity reporting (e.g. S106 monitoring and the LIP) and should be monitored annually. Ongoing engagement relevant stakeholders such as TfL and the PLA will also provide useful feedback on the progress of strategic transport to inform progress on the Infrastructure Delivery Plan and overall strategic transport projects across Newham. Outcome measures are largely those set out in S1 and J policies, together with modal shift/share measures set out in INF2, through the complaints about transport noise will also be relevant.

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<sup>1</sup> [Port of London Authority](#)

<sup>2</sup> LB Newham, [GIS Mapping - LCY](#)

<sup>3</sup> LB Newham, [GIS Mapping - LCY](#)

<sup>4</sup> Currently: Clause 6, Schedule 1 of the Noise Insulation Regulations 1975; BS8233:2014; Building Regulations Approved Document F; and CIBSE TM59/TM52/CIBSE 2015 Guide 'A'

#### 6.206d Indicators

- i. INF-OP-1 Securing Strategic Transport Investment:
  - a. Milestones in transport schemes [monitor as per project and planning milestones indicated in the IDP];
- ii. INF-OP-2 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];
- iii. INF-OUT-1 Environmental Impact of Transport:
  - a. Complaints about transport noise [No specific target, but should be improving];
  - b. Transport related Co2 emissions.

## INF2 Sustainable Transport

Proposals that address the following strategic principles and spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles and Spatial Strategy

- a. Securing a more sustainable pattern of movement in Newham, maximising the efficiency and accessibility of the borough's transport network on foot, cycle and public transport, maximising positive health impacts, and enabling development through:
  - i. Raising and maintaining the safety, quality, appearance and functioning, as spaces for social activity and movement, of the public realm which comprises new and existing streets and other public spaces including squares, parks and riverside pathways, securing improvements to Key Corridors as per SP7, notably the key schemes highlighted in INF1:1bxiii;
  - ii. Continuing to address linear and other physical barriers including rivers, railways and major roads with accessible linkages, and, where applicable, providing connecting public routes through and within new development and to public transport nodes, existing neighbourhoods and facilities, and to linear routes along rivers and docks or connecting green spaces notably through the bridge and connections planned as part of the Lea River Park, the Canning Town Activity and Residential Streets, a crossing of the railway between Connaught Riverside and London City Airport DLR station, and a crossing of the docks from ExCeL to Barrier Park via Silvertown Quays;
  - iii. Reviewing, completing, adding, maintaining and improving defined routes for walking, horse riding and cycling including the Capital Ring, and others specified in INF1 and the IDP;
  - iv. Providing safe, secure and high quality measures to encourage and facilitate cycling as an increasingly popular mode of transport, including, as appropriate, the provision of high quality, continuous dedicated infrastructure, general public realm interventions that benefit cyclists and public cycle parking, both on street and in secure, covered facilities;
  - v. Supporting improvements to local public transport services by continuing to invest in infrastructure and network enhancements, including those specified in INF1 and the IDP, more accessible bus stops, environmental performance, communication and service enhancements and ensuring that negative impacts on transport capacity including stations are fully addressed;
  - vi. Maintaining careful management of the supply of routes and transport network capacity and parking for motor traffic in order to reduce or minimise congestion and the dominance and environmental impacts of motor-vehicular traffic in the public realm and to make space for other modes, having regard to the need to alleviate and not add to cumulative congestion issues as particularly highlighted



in Congestion Zones in policy SP9, and to avoid off-site individual and in-combination effects on air/water quality in the vicinity of the Epping Forest SAC;

- vii. Ensuring that Major development proposals that generate or attract large numbers of trips, including higher density residential and commercial development, are located in areas with good public transport accessibility or planned improvements to this level, and demonstrate the existence of, or propose new safe, attractive walking and cycling routes to public transport nodes; and
- viii Particularly promoting sustainable travel in defined STOAs, through proportionate proposals including car free development.

## 2. Design and technical criteria

- a. In planning public transport and active travel routes across and between Strategic Sites and between new and existing communities, 800m is the maximum distance people should have to travel to bus stops; and 200m and 400m are defined as the optimal route frequencies for pedestrian and cyclists in the Arc of Opportunity to be secured where practicable at least between North Woolwich Road and the River Thames and preferably more generally;
- b. All Major developments (including mixed-use) or proposals meeting the thresholds set out in Table INF1.A will be required to produce a Transport Assessment;
- c. Travel Plans which show the likely impacts of trip generation, and which include acceptable, robust, monitored, proposals to counter or minimise the potential impacts identified, to include 'smarter travel' strategies and plans; and proposed measures to facilitate and encourage more widespread walking, cycling and public transport use will be required in accordance with the following indicative thresholds:
  - i. All major applications;
  - ii. Any development in or adjacent to a-Congestion Zone (SP9) and STOAs; and
  - iii. All D1 uses (including extensions);
- d. An appropriate level of car parking and charging points and bays for electric vehicles and car clubs should be provided taking into account a combination of London Plan Standards, Public Transport Accessibility Levels (PTAL), Local Car Ownership/car sharing opportunities and local context including the availability of existing public parking (parking stress) in line with SP8; and
- e. High quality cycle facilities should be provided ~~in line with~~ recognising the standards set out in the London Plan and local context, as well as opportunities to promote cycle sharing to support sustainable travel to and from the site including where appropriate associated facilities and for washing and changing facilities.

**Table INF.A Transport Assessment Thresholds**

Use	Threshold
A1	1000 sq. m or greater
A3/A4/A5	750 sq. m or greater
B1/B2/B8	2500 sq. m or greater
C1	50 beds or above
C3	30 units or above
D1: Healthcare	50 staff or above
D1: Higher/Further Education	2500 sq. m or above
D1: Places of Worship	200 or greater members/ attendees
D2: Assembly and Leisure	1000 sq. m or greater
Sui generis	Case by case basis

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles and Spatial Strategy.

## Justification

- 6.208a Delivering growth and successful places, and optimising development opportunities are key overarching objectives of the plan. This policy seeks to secure a more sustainable pattern of movement across the borough ensuring growth is not at the expense of the environment and to achieve changes in behaviour to promote sustainable and active travel as a way of life, contributing to the experience of place and neighbourhood ,
- 6.208 Sustainable transport policies seek to achieve better management of travel demand and maximise sustainable travel opportunities to secure a pattern of movement across Newham and beyond that is more sustainable in terms of its reduced negative impacts, (notably on air quality, congestion, safety and noise) health benefits and resource efficiency and ability to keep Newham moving in the face of population growth. To support this, a key component of the policy is to deliver good growth and improve the accessibility and efficiency of sustainable travel modes as well as achieving Convergence and Resilience through more sustainable behaviours. This includes managing the location of development and positive measures secured through the planning process to ensure a good transport experience for residents and prevention/mitigation of impact on Epping Forest SAC, with particular focus on convenient access for non-car modes, journey time reliability and comfort. They are also fundamental to the objective of improving the quality of life of people living and working in the borough, making Newham a more ‘liveable’ borough where people choose to live, work and stay.
- 6.209 This policy recognises the link between transport, design and quality of life. As part of healthy neighbourhoods, environmental impacts arising from transport, such as air and noise pollution which have significant impacts on people’s health and overall quality of life, must be addressed and opportunities maximised to promote Active Travel and reduce the dominance of private car ownership and usage, and to reduce the impact of other

motorised modes.

- 6.210 The importance of a policy for sustainable local transport is underlined by the predicted growth in employment and residential development in the plan period in the borough, particularly in the Arc of Opportunity, East Beckton and at some Strategic Sites within Urban Newham. TfL modelling<sup>1</sup> indicates that development growth will result in very significant consequences in terms of increased traffic congestion, public transport crowding and poorer network resilience to an extent that will affect development viability, economic performance and quality of life unless sustainable transport policies are implemented to spread travel demand.
- 6.211 Consequently, the Council wishes to support through investment a balanced approach to transport which seeks during the plan period to create the conditions in which people will, as a lifestyle choice, actively choose and indeed aspire to travel on foot, cycle and public transport in preference to travelling by car, supported by the proximity of a Metropolitan Centre at Stratford and new employment development. This is a high ambition, but it is considered necessary given the projected rise in the number of homes, jobs and other land uses which generate travel demand from a growing population, and certainly reflects latent potential in terms for instance of flat topography attractive for cycling and the rivers for increasing passenger transport options alleviating pressures on other modes. The policy parameters draw on TfL's Healthy Streets & Streetscapes guidance<sup>2</sup>, and typical continental European grid size<sup>3</sup> and mapping of excess waiting time (congestion), PTAL<sup>4</sup> and car ownership levels<sup>5</sup> (Census), together with spatial policy visions such as improved integration of new development with existing, and a concern to improve public access to the blue ribbon network.

## Implementation

- 6.212 **Raising the quality of the public realm** - this is a central and essential component in the delivery of sustainable transport policies. The design of the public realm should take into consideration the needs of pedestrians, cyclists and public transport and seek to reduce the dominance of spaces by motorised vehicles. The Council produces and regularly updates its public realm design guidance and Policy SP7 (corridors) provides a list and associated criteria for the improvement of major 'gateway' corridors in the borough. Strategic priorities are highlighted in the Royal Docks where growth impacts are particularly acute.
- 6.213 **Tackling barriers and connectivity** - major barriers to movement include busy roads and gyratories such as the A13 and Stratford town centre, railways, river corridors, fence lines, disconnected street patterns and public spaces that feel unsafe at night. The Council supports proposals that seek to reduce the extent of these barriers, benefiting pedestrians and cyclists in particular, and to this end particular key projects have been highlighted. In some areas, development sites and large buildings can also create or act as barriers, and as such, through masterplanning, it is expected that optimal pedestrian and cycle route

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<sup>1</sup> [Mayors Transport Strategy](#)

<sup>2</sup> [Healthy Streets/ Streetscapes Guidance](#) p. 189

<sup>3</sup> [European grid size reference](#)

<sup>4</sup> [WebPTAL](#)

<sup>5</sup> [Car Ownership \(Census\)](#)

frequencies are incorporated, at least between North Woolwich Road and the River Thames, but preferably also in other directions given their ability to render walking and cycling much more competitive in relation to other modes over short distances. These frequencies will also be relevant to securing connectivity between sites, existing neighbourhoods and other facilities.

- 6.214 **Improving and completing formal walking, cycling, equestrian routes** - the borough benefits from several well-used and well-defined, largely traffic-free routes for pedestrians, cyclists and equestrians. Support will be given to proposals for improvements to these routes and links to them, and proposals that compromise their accessibility will be resisted. Support will also be given to the completion, improvement and extension of signed formal cycle routes including the LCN+ and Cycling Superhighways.
- 6.215 **Providing high quality infrastructure for cyclists** - support will be given to proposals for implementing high quality cycling infrastructure including dedicated cycle tracks adjacent to wider carriageways that provide priority and safety for cyclists, particularly at junctions. Cyclists will also be provided for in the general design of the public realm, for example by tightening junction geometries, providing traffic calming and allowing cycling on suitable pathways through parks. Support is also given for public on street and secure, covered cycle parking and proposals that support a wide range of cycle hire and membership schemes to increase the uptake in cycle usage in the borough.
- 6.215a **Cycle parking standards** - cycle parking will be provided in accordance with the London Plan and designed adhering to the London Cycle Design Standards. In addition, physical or financial contributions will be sought to provide public or visitor cycle parking facilities. To ensure high quality provision of cycle facilities, cycle parking must be provided in locations that are integral to the development; it should be safe, secure (including weatherproof) and easily accessible, preferably near to main entrances. Securing high quality cycle facilities is essential to support Newham to realise a substantial increase in cycling and high quality cycling infrastructure. Cycle parking should be complemented by supporting facilities including lockers and showers.
- 6.216 **Supporting improvements for public transport** - the Council supports ongoing improvements to the transport network as highlighted in INF1 and the IDP together with other measures that enhance the journey experience or reduce negative impacts of the service, but also needs to ensure that negative impacts of development on transport capacity (including safety and extra wear and tear) are fully addressed, particularly at stations.
- 6.217 **Careful management of car travel and parking demand** - the Council supports measures to manage car travel and parking demand by encouraging changes in mode choice favouring walking, cycling and public transport use, through public realm interventions, parking management and publicity. Residents' parking zones are considered by the Council to be an effective way to manage local roads in order to address issues such as traffic/ parking congestion, access, safety and car borne pollution and have been implemented fully across the borough.
- 6.217a **Car parking standards** – appropriate levels of car parking should be assessed in line with

the London Plan standards<sup>6</sup> taking account of the cumulative impact of car parking standards as a lever on travel behaviour (particularly when established from the outset) and the opportunity costs of space for car parking whilst factoring in wider considerations including access realities (i.e. whether available routes/capacity meet local needs/building occupants' requirements and the quality of public transport/active travel experience), the type of development, local car ownership and context and the overall approach to reduce car usage in Newham. In the case of electric vehicle charging provision the Council will seek passive provision to London standards, with the operational provision to be determined on a case by case basis. STOA designation helps indicate where car ownership and public transport access is such that car parking levels can be significantly reduced, potentially to car free levels.

- 6.218 **Accessibility by a choice of modes of transport** - the Council will not support major development proposals that are not accessible by a choice of modes of transport. Whilst PTALs are a good guide to relative accessibility to public transport services, (with 4 and above denoting 'good') it should be acknowledged that they may change over time, and proposals should also demonstrate the availability of, or proposals for, safe, direct and attractive walking and cycling routes to and from the site to public transport nodes and interchanges. To this end, 800m is the maximum distance between bus stops; with a preference for 300-400m where possible.
- 6.219 **Transport Assessments/Statements and Travel Plans/Statements** - the Council will seek Transport Assessments and Travel Plans that measure the potential environmental and capacity (particularly at stations) impacts of travel demand arising from new development. These should include acceptable robust, measured strategies and travel plans for mitigating or minimising adverse impacts, including cumulative impacts on traffic flows in the wider network that may affect air/water quality within 200m of the Epping Forest SAC and highlighted by the defined congestion zones in Newham, through measures to encourage walking, cycling and public transport use in preference to private vehicles. Travel Plans should set out strategies for implementing, monitoring, maintaining and improving performance against agreed strategies and targets for reducing car use and increasing walking, cycling and public transport use, cognisant of the particular potential highlighted by STOA designation. In some cases for smaller scale development Transport Statements and Travel Plan Statements are likely to be required setting out the transport impacts of development and measures to promote sustainable travel and should be identified at the earliest stage. The thresholds are suggested as a guide and the Councils reserves the right to vary the requirement for site specific reasons.
- 6.222 Developer contributions will be required to support the implementation of the sustainable transport measures outlined as per INF9. These will be in addition to addressing on site access issues.
- 6.223 On site measures for sustainable transport provided by developers are the subject of design guidance, notably TfL Streets Toolkits. These measures should be factored into all stages of the development process from construction through to operation with proposals addressing best practice guidance including within Construction Logistics Plans and Streets Toolkits (including Cycle Design Standards) by TfL.

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<sup>6</sup> Including the draft London Plan expectation of car free as a starting point in areas with PTAL 4-6

6.224 The Local Implementation Plan sets out a programme and funding proposals for sustainable transport projects. The funding proposals include indicative proposed developer contributions. The borough will be required to produce and updated LIP3 documents by September 2018.

## Monitoring

6.224a The monitoring framework for this policy includes specific performance indicators relating to the promotion (outputs) and take up (outcomes) of sustainable travel modes, as well as consequent broader impacts on sustainability. The outputs and outcomes, supported in planning, regeneration and through complementary measures, will be drawn from general activity reporting (e.g. planning conditions monitoring) and from modal shift statistics available from TfL (annually) , and should be monitored annually. Feedback from residents and members and through monitoring of policy use will also be relevant to help understand whether the policy fully captures the necessary range of measures to help people change their travel behaviour.

### 6.224b Indicators

Note that targets will be revisited and aligned with the 2018 LIP and subsequent updates.

- i. INF-OP3 Promoting a more sustainable pattern of movement:
  - a. School Travel Plans in place;
  - b. Number of Car Free development achieved on major schemes [no specific target, monitor to show increase];
  - c. Electric charging points [No specific target – monitor to show increase and take-up];
- ii. INF-OP-2 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];
- iii. INF-OUT2 Better Transport and Connectivity:
  - a. Modal shift and share [number/percentage of Walking, Cycling, Bus, Tube/Rail, Car trips originating in the borough, should show a shift to more sustainable modes];
  - b. Traffic volume and congestion (proxy) - Excess bus waiting time [refer to LIP targets];
  - c. Road traffic casualties (KSIs) [No specific target, should be improving];
- iv. INF-OUT3 Environmental Impacts of Transport:

- a. Noise complaints [No specific target, should be improving];
- b. CO2 emissions from transport [refer to Air Quality Monitoring Plan].

## INF3 - Waste and Recycling

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles:

- a. The management of waste and development of waste facilities will:
  - i. Follow the waste hierarchy (prioritising reduction, reuse, recycling, and energy recovery before final disposal);
  - ii. Prioritise rail and water transport over use of the principal road network;
  - iii. Observe the proximity principle (dealing with waste as close to its source as possible); and
  - iv. Minimise spatial impacts;and
- b. Compliance with the East London Waste Plan<sup>1</sup> while recognising any updates to the strategic framework of the London Plan.

### 2. Spatial Strategy:

- a. Schedule 1 safeguarded sites<sup>2</sup> will be protected and prioritised for new or expanding waste facilities for which there is a proven local need, followed by Strategic Industrial Locations as far as possible. Other locations may prove suitable where acceptable mitigation of impacts can be delivered in line with other development plan policies (specifically SP3, SP8 and SC5);
- b. Development at Beckton Riverside will include a waste facility with capacity to meet strategic waste needs unless it is demonstrated that there is no longer a need for such a facility in that location (through updated evidence concerning strategic ~~ne~~ need via an updated Joint Waste Plan or submission of equivalent robust evidence); and
- c. Other waste sites will be protected as per Managed Release, transition and intensification specifications set out in J2 and where relevant, spatial policies.

### 3. Design and technical criteria:

- a. As per policy SC5, all waste facilities should be fully enclosed or provide an equivalent level of environmental protection with respect to air emissions;

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<sup>1</sup> Currently the 2012 [Joint Waste Development Plan for the East London Waste Authority Boroughs](#)

<sup>2</sup> Currently found in the [Joint Waste Development Plan for the East London Waste Authority Boroughs](#) (2012), any update to the Joint Waste Plan will likely still contain a schedule of safeguarded sites.



- b. Development should ensure on-site handling and storage can meet the needs of the development and local collection arrangements without amenity impacts for occupiers or neighbours; this includes future-proofing through the facilitation of tri-separation and collection. Where feasible, innovative approaches to sustainable waste management that support the implementation of policy SP3 and SP8 should be provided; and
- c. Major development proposals should be accompanied by Site Waste Management Plans setting out how the requirements of this policy are met.

For the purpose of Neighbourhood Planning, the following sections and sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles; 2.Spatial Strategy.

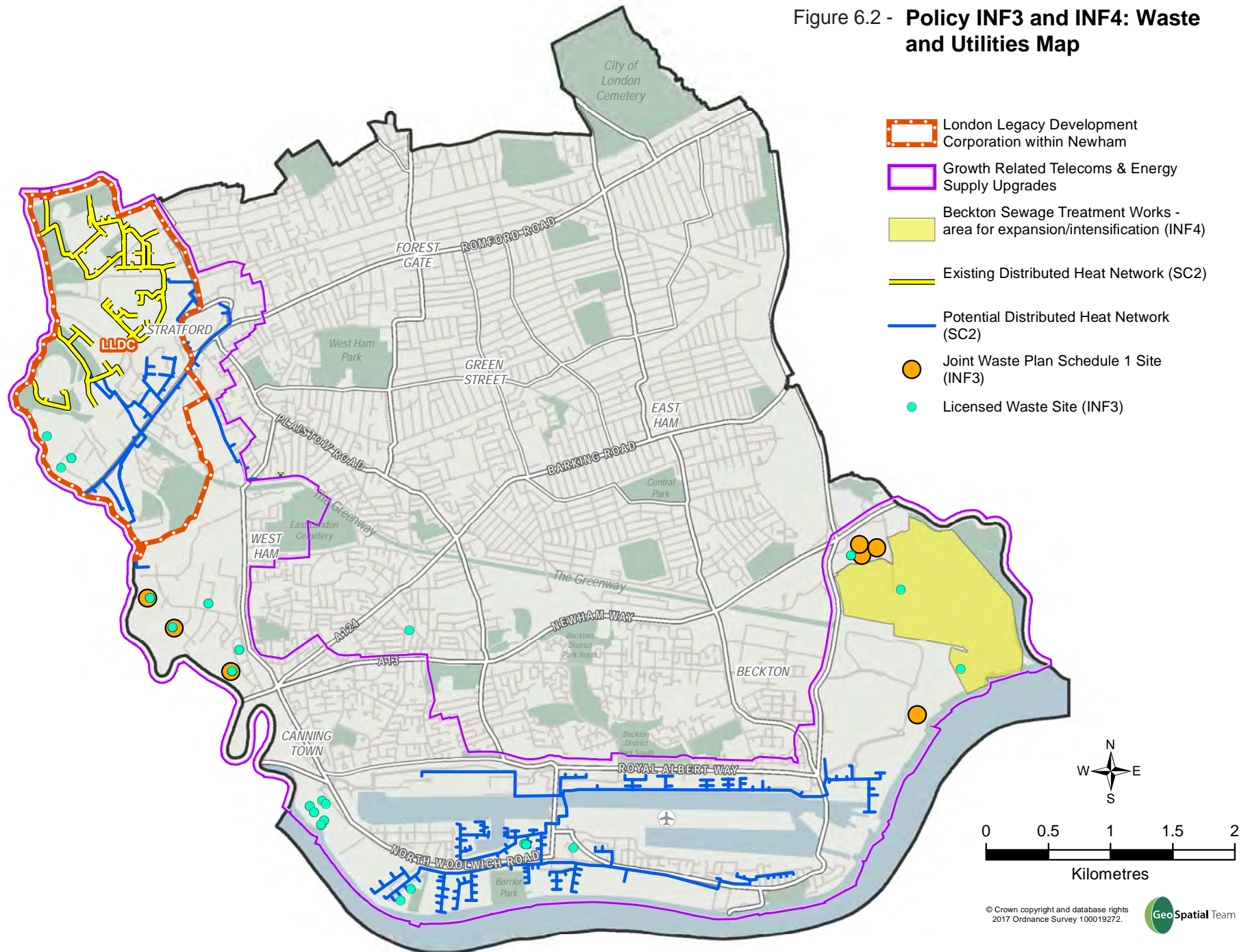
### Justification

- 6.226 Notwithstanding local, regional, and national drivers of improved recycling rates and embedding of 'circular economy' principles, the levels of growth expected in Newham (in terms of both construction/development activity and population) mean a projected increase in waste arising figures. This policy seeks to ensure waste is managed more sustainably, minimising resource use and exploiting the economic potential of 'waste'. It transfers EU Directive principles to the local context and urges developers to be proactive about how waste is handled in the context of increasing environmental and land use pressures. The policy contributes to the achievement of convergence (objective 1) by helping ensure the economic benefits of 'waste' are harnessed; the creation of high quality places (objective 2) by avoiding the amenity and environmental impacts of mishandled waste; the delivery of good growth (objective 3) by minimising the environmental impacts of resource use and waste generation; and the balancing of Newham's local needs and strategic role (objective 4) by ensuring new waste uses satisfy identified needs and are directed to the most suitable locations.
- 6.227 Good waste management aims to drive waste arisings up the waste hierarchy by promoting waste minimisation, materials reuse, recycling and the recovery of resources including energy from waste assets. The proximity principle derives from EU Directive<sup>3</sup> and establishes that waste should in general be treated and disposed of as close to where it was produced as possible. Subject to other environmental, efficiency, and feasibility considerations, the principle seeks to minimise the impacts of transport and multi-handling of waste. It is reflected in London Plan policy 5.16, which sets out to deliver net waste self-sufficiency for London by 2026. The principle of prioritising rail and water transport of waste also seeks to minimise the environmental impacts of waste transfer as Heavy Goods Vehicles are known to have significant impacts on air quality and traffic flows. While this may be difficult to deliver through collection services, Newham's position next to the Thames and the high levels of construction activity in the borough should enable implementation of the policy in other ways.

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<sup>3</sup> Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on waste (OJ L 114, 27.4.2006)

Figure 6.2 - Policy INF3 and INF4: Waste and Utilities Map



- 6.228 In line with self-sufficiency objectives and to meet regional needs, the London Plan sets out an apportionment target of waste to be processed and managed by each London borough. As Newham is in a waste authority partnership with three other London boroughs, this is primarily done through the identification and safeguarding of sites within the East London Waste Plan. Adopted in 2012 as the *Joint Waste Development Plan for the East London Waste Authority Boroughs* (link in policy footnote above), this Joint Waste Plan is likely to be updated within the Local Plan period to reflect changes in land use configuration and updates to waste apportionment figures.
- 6.229 The Council also seeks to minimise or mitigate the impacts of waste management, processing and transport on the environment and the borough's residents. Consequently, preference will be given to proposals that make efficient use of space, enable and make provision for access by river and rail freight, and avoid harmful impacts on amenity and air quality (see related policies SC5 and SP8).
- 6.229a The spatial strategy sets out that where the introduction or expansion of waste facilities meets and identifiable local need, Schedule 1 safeguarded sites followed by Strategic Industrial Locations will be prioritised. This approach helps to direct waste uses to the most appropriate locations (often in terms of impacts and serviceability) and helps to protect those uses long term. In the context of this policy, 'local' means not only waste arising *within* Newham, but also waste handling capacity that contributes to the meeting of London Plan apportionment targets and deals with waste arising within other London boroughs (i.e. part of Newham's local need is its regional role). As such, proposals that do not demonstrate how they meet local or regional need will generally not be supported. It is however acknowledged that given that the Joint Waste Plan review has yet to commence, with its process of need analysis and site search, which may identify further suitable locations.
- 6.229b Beckton Riverside is a significant growth area as signalled in the London Plan and expected GLA OAPF; the spatial strategy approach above seeks to balance the needs of waste capacity protection with growth and housing delivery targets. Whilst recognising that the scale of development expected for the area is such that a new waste facility could be incorporated, the policy allows for shift in waste needs over time. Given the scale and complexity of development envisioned for Beckton Riverside (see Strategic Site allocation for more detail) realisation of opportunities is expected to have a long lead time; in that time, waste needs may change significantly, for example through improved recycling rates, changes in London Plan apportionment methodology, or the securing of other safeguarded sites.
- 6.229c It is acknowledged, that as with other industrial uses, waste processing/management facilities have come under pressure due to competing land uses, notably residential, not least as many have been inappropriately regarded until recently as 'inefficient' users of space. Whilst land use change must necessarily continue in the borough, such uses are afforded protection through the Managed Release, Managed Transition and Managed Intensification criteria in Policy J2, with the industrial land safeguarded with capacity allowing for their accommodation in the borough according to projected need in the ELR (in which they are a component of identified industrial space requirements including an allowance for sub-regional demand/apportionment).

## Implementation

- 6.233 Schedule 1 and 2 waste sites are currently found within the 2012 Joint Waste Plan though this is likely to be reviewed within the plan period. The policy will remain applicable to any replacement 'Schedule 1' sites (i.e. safeguarded); the updated plan is likely to be called the East London Waste Plan (ELWP). Schedule 2 sites, which reflect capacity to meet strategic waste needs will be revisited by the update; in the meantime should development come forward on that presently identified in Beckton (which falls within the Beckton Riverside Strategic Site S01) the site allocation together with this policy provides for delivery of a strategic waste facility in accordance with the objectives of the Joint Waste Plan Policy W2, directing such development to remaining SIL or requiring the submission of updated evidence that demonstrates that the strategic need is no longer present. This may be due to intensification of capacity elsewhere, changing waste needs and apportionment (including a revised sub-regional distribution) or identification of an alternative site to meet that need.
- 6.233a Further guidance on the meaning and application of the waste hierarchy is available from DEFRA<sup>4</sup> and WRAP<sup>5</sup> (the Waste and Resources Action Programme), specific government guidance on applying the hierarchy to the management of hazardous waste management is also available<sup>6</sup>.
- 6.233b Supporting the implementation of this policy and Building Regulation requirements, the Council has produced guidance<sup>7</sup> for new development that details the amount of waste storage capacity expected, the needs of typical Local Authority and private collection service vehicles, and best practice advice regarding bin store location and design.
- 6.233c Construction and Logistics Plans for new waste management proposals should demonstrate how the use of rail and water freight is maximised, particularly where sites are close to the Blue Ribbon Network. Where considered necessary, planning conditions may be established to define the proportion of waste transported by sustainable modes.
- 6.233d The principle of minimising spatial impacts of waste management should be applied to both waste facilities and the handling and storage of waste within other development, applicants should refer to policy SP8 for more detail on the range of amenity impacts that will need to be considered. In relation to facilities (including heat from waste operations) this will mean consideration of air quality impacts, overall land take, and effects on any nearby residential amenity (e.g. via noise and smell) – though the spatial strategy primarily directs waste uses to non-residential areas. Where considered necessary, planning conditions will be used to specify expectations in relation to enclosure and emissions mitigation.

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<sup>4</sup> <https://www.gov.uk/government/publications/guidance-on-applying-the-waste-hierarchy>

<sup>5</sup> <http://www.fccenvironment.co.uk/assets/files/pdf/content/wrap-applying-wastehierarchy.pdf>  
<http://www.wrap.org.uk/sites/files/wrap/achieving%20good%20practice%20waste%20minimisation%20and%20management.pdf>

<sup>6</sup> <https://www.gov.uk/government/publications/guidance-on-applying-the-waste-hierarchy-to-hazardous-waste>

<sup>7</sup> [www.newham.gov.uk/wasteguidance](http://www.newham.gov.uk/wasteguidance)



- 6.233d(i) In terms of waste management within development, the local guidance referenced above gives specific examples of how bin stores etc. should be designed and located to minimise impacts as per Policy SP8. Tri-separation facilitates the separate collection and processing of three waste streams (non-recyclable waste, recycling, and food waste), improving efficiency and outcomes. While Newham does not currently operate a food waste collection service this is likely to change in future given regional and national drivers. For most developments, 'facilitating' will simply mean space for containers but for those incorporating chutes, tri-separators should be installed.
- 6.233e The consideration of the environmental protection levels delivered by new waste facility proposals will be done through the Environment Agency's licensing processes; as such proposals should show evidence of engagement with the EA.
- 6.233f The requirement for major developments to make use of Site Waste Management Plans is encouraged by the Environment Agency and the London Plan given the multiple benefits they can bring including accurately estimating waste levels prior to the start of works, reducing amenity impacts, facilitating regulatory compliance, and minimising costs through early planning and consideration. Relevant guidance is produced by WRAP<sup>8</sup>.

## Monitoring

6.235a Monitoring will include indicators relating to delivery of the strategic principles, spatial strategy, and design and technical criteria to assess the efficacy and suitability of the policy. Outputs related to waste activity will be drawn from review of planning consents; depending on the number of relevant applications per year this will be done via full review or sample. Whilst waste generation and recycling rates are driven by factors the planning system can only partially affect (specifically attitudes toward the importance of recycling), outcome indicators relating to recycling rates, diversion from landfill, and levels of waste collected per head will also be monitored, with information drawn from the Environment Agency's Waste Data Interrogators.

### 6.235b Indicators:

- i. INF-OP-10 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny];
- ii. INF-OP-5 Securing more sustainable waste management:
  - a. New waste management facilities in line with the spatial strategy [Target: majority of relevant consents];
  - b. New/intensified waste management facilities delivering full enclosure or equivalent environmental protection–[Target: majority of relevant consents];
  - c. Loss of waste handling capacity [Target: no net or functional loss without compensatory capacity appropriate consistent with the strategic principles];

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<sup>8</sup> <http://www.wrap.org.uk/sites/files/wrap/GG899.pdf>

- iii. INF-OUT-4 Reducing Waste:
  - a. Percentage of household waste sent for recycling, reuse or composting [No specific target, should be improving] (%);
  - b. Percentage of local authority collected waste diverted from landfill in East London Waste Authority region [Barking & Dagenham, Havering, Newham, Redbridge] (%);
  - c. Household waste collected per head (kg) [no specific targets, positive trends should be observed].

## INF4 - Utilities Infrastructure

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic principles:

- a. Sufficient utilities infrastructure capacity (including energy and water supply, wastewater handling, and telecoms) will be established to meet the needs of development over an appropriate time horizon, with projects identified in the IDP receiving in principle support;
- b. The spatial and environmental impacts of utilities infrastructure will be minimised and where feasible reduced, particularly where existing facilities are being expanded or reconfigured;
- c. The expansion of decentralised energy networks will be facilitated and supported in principle; and
- d. The use of innovative energy technologies that reduce fossil fuel use and emissions by exploiting sustainable or waste energy sources is encouraged, specifically air, ground, waste, and water heat pumps where appropriate.

### 2. Spatial Strategy:

- a. Utilities infrastructure, particularly in the Arc of Opportunity will evolve to keep up with growth and facilitate the creation of new neighbourhoods and economic opportunities. This includes but is not limited to:
  - i. Expansion of operational capacity at Beckton Sewage Treatment Works;
  - ii. Extension of superfast broadband to new development sites and new and existing employment areas;
  - iii. Provision of additional energy transmission infrastructure in the vicinity of the Royal Docks and Beckton, and heat network infrastructure to distribute locally generated energy across the Arc;
  - iv. De-commissioning and remediation of gasholder sites, providing necessary legacy gas pressure etc. infrastructure.

### 3. Design and technical criteria:

- a. Confirmation that sufficient utilities capacity exists to meet the needs of the development will be required, with proportionate contributions to studies or upgrades made where necessary;
- b. All energy sources (including CHP and renewable energy installations) with an output of 50kWe or more should provide for connection to heat networks and be flagged to the GLA for inclusion on the London Heat Map;
- c. As per SC2, all major development should prioritise connection to heat networks or provide for connection in future where connection is not made prior to occupation;

- d. Heat network infrastructure should be designed, constructed, and managed in accordance with the London Heat Network Manual<sup>1</sup> and Policy SC2;
- e. Air, ground, waste, and water source heat pump installations should conform to relevant up-to-date guidance and ensure all licences from relevant statutory bodies can be acquired;
- f. New and intensified utilities infrastructure projects, should demonstrate, through an options appraisal, that the favoured scheme is the most appropriate in terms of spatial and environmental impacts, costs and feasibility;
- g. All new development, including road and rail schemes, should incorporate future-proofed ducting to accommodate utilities connection requirements, and be designed to accommodate access and safety considerations in relation to key utilities infrastructure including high voltage cabling;
- h. Development in the vicinity of Beckton STW should undertake an Odour Impact Assessment and respond with appropriate mitigation as necessary as per the guidance cited in policy SP8.

Refer to combined INF4/INF3 map (Figure 6.2) for spatial elements.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Spatial Strategy.

### Justification

- 6.235 Utilities infrastructure in London is already stretched; the levels of growth expected in Newham, and specifically in the Arc of Opportunity, means capacity of multiple kinds must be increased to facilitate the creation of new neighbourhoods (such as Beckton Riverside) and take up of economic opportunities (for example in the Royal Docks Enterprise Zone) that have a significant local and regional role. Known issues include water supply and sewage handling in the Thames Water area generally, energy supply/transmission infrastructure in the Royal Docks and the need to extend super-fast broadband, as per the IDP. If growth expectations are to be met, utilities enhancements must also work in tandem with new development in an already heavily urbanised area and minimise land take as well as other spatial and environmental impacts (including noise, smell, and visual intrusion). Such pressure also extends to the increasing need to decommission and remediate the now unnecessary multiple gas holders in the area, which consume considerable areas of land, with legacy gas pressure etc. infrastructure being far more modest.
- 6.235a This policy contributes to all plan objectives, seeking to enable economic growth (objective 1), create high quality places that do not suffer the effects of utilities shortfall (objective 2), deliver good growth by embedding utilities needs and future-proofing to avoid further

<sup>1</sup> [https://www.london.gov.uk/sites/default/files/london\\_heat\\_map\\_manual\\_2014.pdf](https://www.london.gov.uk/sites/default/files/london_heat_map_manual_2014.pdf)



works and improve construction efficiency (objective 3), and balance local and strategic needs, for example in recognising that whilst facilities like Beckton Sewage Treatment Works may need to expand to meet [local and] strategic needs, that this should be counterbalanced by the minimisation of local impacts (Objective 4).

- 6.235b District heat networks are supported by national<sup>2</sup> and London Plan planning policy as a means of meeting the requirements of the Climate Change Act to reduce UK CO2 emissions to 80% below 1990 levels by 2050. Networks can be implemented at the scheme/site level as well as neighbourhood-wide, taking strain off the traditional grid and encouraging use of more sustainable forms of energy generation. Growth expectations in the Arc of Opportunity not only provide the need for expansion but the opportunity; the development of energy and heat networks should be embedded in the earliest stages of planning and masterplanning new development. Part of facilitating heat network expansion is an accurate picture of potential and demand, as such all energy generating sources over a certain threshold should be included on the London Heat Map.
- 6.235c This policy helps make best use of locally available energy sources, supporting the implementation of policies SC1 and SC2 by (amongst other things) identifying relevant standards for heat network and heat pump installations (3d/e), and requiring their spatial impacts to be minimised as far possible (1b). Government research<sup>3</sup> has shown the huge potential of Water Source Heat Pumps in the UK and London; as such, Newham's Royal Docks asset and position alongside the Thames should be investigated for the potential benefits of a sustainable, renewable, and 'free' source of heat, helping to improve local energy resilience. Similarly heat pumps can be used to exploit ground, air, and waste heat (i.e. from transport of industrial processes); provided the environmental impacts of such installations are acceptable (including no worsening of air quality), their take-up is encouraged. These renewable technologies complement more widely understood options such as solar (PV), options for which should also be explored as an example of locally available / renewable energy (the Council notes that there is not considered to be significant potential for wind energy within the Borough).
- 6.235d Utilities needs are evolving, which makes definitive planning for them difficult at the point of design and construction. It is therefore logical to take an enabling approach: designing and building in additional capacity in terms of utility connection ducts, and providing for future connection to heat networks where present connection is not possible. Experience in the Olympic Park area for example, has shown that 'passive ducting' (beyond what was needed at the point of development completion) through development platforms has been taken up within a few years, achieving considerable cost savings on, for example, subsequent lighting and CCTV schemes.

## Implementation

- 6.235e As per the support in principle for the expansion of heat networks, permissions for related infrastructure will normally be granted subject to appropriate mitigation of impacts and compliance with other development plan policies. To ensure longevity and efficiency

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<sup>2</sup> <https://www.gov.uk/government/publications/2010-to-2015-government-policy-low-carbon-technologies/2010-to-2015-government-policy-low-carbon-technologies#appendix-10-heat-networks>

<sup>3</sup> <https://www.gov.uk/government/publications/water-source-heat-map-layer>

(including the avoidance of heat loss), heat network apparatus should be designed and constricted in line with the GLA's Heat Network Manual or subsequent updates.

- 6.235f As per the minimising spatial impacts point, opportunities for retrospectively minimising the impacts of utilities infrastructure should be sought in addition to the expectation applying to new and expanded facilities, this might apply to the undergrounding of pylons, the siting, scale, and design of sub-stations, or the reconfiguration of existing sites such as Beckton Sewage Treatment Works. While expansion of capacity is supported, and will likely mean some expansion of operational land-take, solutions should be as space efficient as possible and mitigate impacts appropriately. However, this must necessarily work in conjunction with the 'agent of change' approach set out in policies SP8, J1 and J2 in relation to new development in the vicinity of such infrastructure, including ensuring that statutory [utilities] undertaker duties and safety requirements are met.
- 6.235fa To confirm that sufficient capacity exists applicants should liaise with utilities providers as early as possible to determine if an assessment needs to be undertaken. In the case of water and waste water it is expected that the impact of development both on and off-site is considered. In some instances it may be necessary to undertake appraisals to determine if a proposal will lead to overloading of existing water or waste water infrastructure. In the absence of detailed design and phasing details, planning permission for developments which result in the need for off-site water/wastewater infrastructure upgrades may be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.
- 6.235g Examples of relevant guidance for heat pump installations include the Environment Agency's *Good Practice for Ground Source Heating*<sup>4</sup> or the (now abolished) Department for Energy and Climate Change's Water Source Heat Pump research<sup>5</sup>. For any apparatus to be installed in waterways, developers should seek the advice of the Port of London Authority, Environment Agency, and Marine Management Organisation where relevant, and ensure all necessary licences can be achieved.
- 6.235h The London Heat Map<sup>6</sup> shows existing and proposed heat networks in Stratford and the Royal Docks, including details of energy sources. Developers are encouraged to engage with the heat map to determine the opportunities associated with sites.
- 6.235i It is acknowledged that gasholder decommissioning and remediation is costly, though standard viability methodologies assume this is factored into viability calculations initially through land value and the concept of the 'reasonable premium' and then if necessary, via cross-subsidy from enabling development, if otherwise acceptable.
- 6.235j As per the IDP, the GLA are working with electricity infrastructure providers to resolve the pressing need for capacity upgrades to meet growing demand in the Royal Docks and Beckton. A site search, focusing on land within the GLA portfolio with minimum spatial impact is being undertaken with provisional targeting of further work on Albert Basin and Thames Wharf. This policy seeks to work within the context of that work, which in turn is

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<sup>4</sup> [https://www.gshp.org.uk/pdf/EA\\_GSHC\\_Good\\_Practice\\_Guide.pdf](https://www.gshp.org.uk/pdf/EA_GSHC_Good_Practice_Guide.pdf)

<sup>5</sup> Including '[Water Source Heat Pumps – Navigating the Way: A Customer Journey for potential developers](#)' - these documents are available from the Local Plan team if no longer available online.

<sup>6</sup> <https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map>

consistent with its principles, though will need to be tested also against other relevant policies in the plan.

6.235k The design and siting of development should recognise the presence of high voltage cabling both on and off site and adhere to statutory clearance limitations in relation to overhead lines, reference to National Grid guidance should be made<sup>7</sup> and demonstrated as part of a development proposal where relevant.

## Monitoring

6.242a Whilst the reporting systems of infrastructure and utilities providers are not consistent and easy to draw upon monitoring will try to assess the scale of objections from utilities providers on grounds of capacity, and gather evidence of utilities shortfall issues. Where major capacity issues arise (significant power outages for example, or telecoms failures) and are reported, an analysis of the role of the planning system will be included in relevant Authority Monitoring Report bulletins.

### 6.242b Indicators:

- i. INF-OP - 6 Sufficient and Sustainable Utilities Infrastructure:
  - a. Proportion of consents providing connections to or future connection to heat networks (via a sample audit) [No specific target: should be increasing];
  - b. Utilities infrastructure planning and project milestones met [Target: milestones set out in the IDP];
- ii. INF-OP - 7 Policy Use and Robustness [no specific target, monitor for expected use and ability to withstand appeal scrutiny].

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<sup>7</sup> <https://www.nationalgrid.com/uk/about-grid/our-networks-and-assets/land-planning-and-development>

# INF5 Town Centre Hierarchy and Network

Proposals which address the following strategic principles, spatial strategy and technical criteria will be supported:

## 1. Strategic Principles

- a. The expectation that proposals will contribute to the re-definition and management of Newham's interrelated town centre hierarchy and network as defined on map INF5, securing accessible shopping, services and employment in focused successful centres across the borough, reducing trade leakage; and
- b. That regard should be had to the importance of capacity projections modelled on a borough-wide basis, with reference to the latest Newham Town Centre and Retail Study and updated monitoring of commitments, and potential trade and spatial impacts within the centre and on other proximate centres.

## 2. Spatial Strategy

- a. The need for Stratford town centre, within the boundaries defined on the Policies map, to maintain its role and function as a Metropolitan Centre and progress towards an International Centre role, ensuring it continues to meet a wide range of local, borough-wide and sub-regional needs in the scale, diversity, accessibility, and integration of its offer;
- b. The aspiration for Canning Town town centre (currently a District Centre) within the boundaries defined on the Policies Map to move up the hierarchy, through transformational change to the scale, layout, accessibility and nature of its offer whilst continuing to meet local needs, integrating the new and existing parts of the centre;
- c. The need for East Ham town centre within the boundaries defined on the Policies map to maintain its role and function as a Major Centre ensuring it continues to meet a wide range of borough-wide and local needs through improvements to accessibility, growth and renewal of floorspace, particularly aimed at consolidating its strong convenience role, whilst improving its comparison, quality leisure and community offer and ~~but~~ retaining its independent retailers;
- d. The need for Green Street town centre within the boundaries defined on the Policies Map to maintain and develop its role and function both as a District Centre and a specialist ethnic centre, through improvements to accessibility, the growth and renewal of floorspace, creating a wider range of unit sizes and aiming to expand its comparison, community and quality leisure offer but retain its independent retailers;

- e. The need for Forest Gate town centre within the boundaries defined on the Policies Map to maintain and develop its District Centre role and function through the growth and renewal of floorspace to better meet a wide range of local community needs, targeting a medium-sized foodstore and comparison retailers but retaining its independent offer, and improving north south integration over the Romford Road;
- f. The need for East Beckton town centre within the boundaries defined on the Policies Map to consolidate its convenience and local service District Centre role through renewal of floorspace and improved diversity of offer, whilst enhancing its links with local neighbourhoods;
- g. The need to maintain existing Local Centres as listed below and designated on the Policies Map, promoting the co-location of other essential community uses within or adjacent to them in line with INF8, recognising the particular regeneration and enhancement opportunities at North Woolwich, Manor Park and Freemasons Road (Custom House);
- h. The need and opportunity to create new Local Centres reflecting accessible locations with high footfall, large scale development sites and gaps in the network at West Ham station, Silvertown, and Thames Wharf, Albert Basin (Gallions Reach DLR) and Plaistow station, with further sites to be identified in Beckton Riverside at accessible locations with high footfall that do not have reasonable pedestrian access (400-800m, taking into account route quality) to existing or proposed centres serving similar needs;
- i. The need to retain, and exceptionally create isolated shops together with small groups of shops which contribute to 400m accessibility benchmarks, but which are not in areas suitable for local centre scale growth, for retail use only, designating them as Local Shopping Parades – as set out in Table INF.B below and on the Policies Map - and Protected Isolated Shops;
- j. The need for Gallions Reach Shopping Park to become a Major Centre serving the eastern edge of Newham and wider growth area, through re-configuration of its floorspace as part of a wider masterplan for the area to incorporate a more rounded offer and vertical mixed use, with improved local connections and public transport links;
- k. Town centre uses will be directed to the above designated Town and Local Centres first as appropriate to their scale; and
- l. The consolidation of existing commercial and community uses into defined centres of an appropriate scale will be encouraged, unless otherwise protected.

### 3. Design, Management and Technical criteria:

- a. The requirement for impact assessments on any out of centre retail or other town centre uses over 300 sq m net (sales floorspace) considering quantitative and qualitative issues, including spatial impacts; and
- b. The requirement for new publicly accessible toilets to be provided for in new strategic development which incorporates local or town centres and that these should be managed as part of the public realm or broader community facilities open to all.

**Table INF.B: Local Centres & Local Shopping Parade**

Local Centre ID	Name/Location	Local Shopping Parade ID	Name/Location
LC1	Manor Park	LSP 1	Jack Cornwell Street
LC2	Maryland	LSP 2	Katherine Road
LC3	High Street North	LSP 3	Plaistow High Street
LC4	Vicarage Lane	LSP 4	Vicarage Lane (E6)
LC5	Church Street	LSP 5	West Ham Memorial Parade
LC6	Plaistow Road	LSP 6	Prince Regent Lane North
LC7	Terrace Road	LSP 7	Tollgate Road
LC8	Boleyn	LSP 8	Fife Road
LC9	High Street South	LSP 9	Cundy Road
LC10	Greengate	LSP 10	East Ham Manor Way
LC11	Abbey Arms	LSP 11	Western Gateway
LC12	Freemasons Road	LSP 12	Albert Road
LC13	North Woolwich		

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Spatial Strategy.

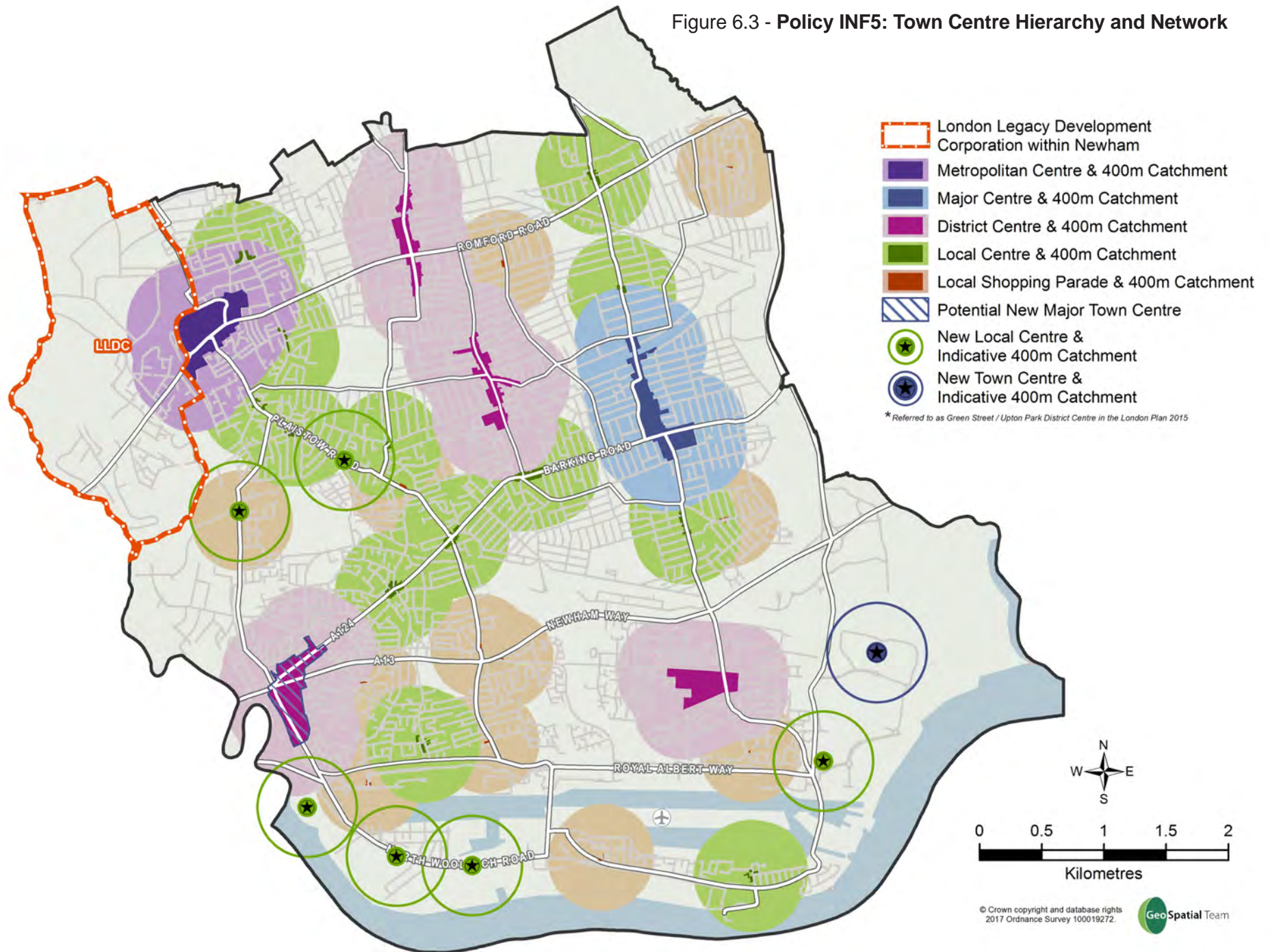
## Justification

6.244 Town and Local Centres operate as part of an interrelated network and hierarchy of retail and associated service provision, with changes to one having the potential to affect others over the space that people are prepared to travel in. Their management as a component of social infrastructure provision (meeting various needs, including access to shops, other services and community facilities) as well as part of economic growth (see Policy J1) is facilitated by recognition of this interdependency and clarity as to their differential roles and functions and the degree of change that can be accommodated without unintended negative impacts. This requires assessment of spatial, qualitative and quantitative patterns of use and future capacity for growth and change, and a borough-wide strategy that reflects them, alongside more qualitative change provided for as part of Policy SP6 and spatial policies and jobs policies that reflect the borough-wide economic development strategy.

6.245 In line with national and regional policy, a key component of this policy is that town centre



Figure 6.3 - Policy INF5: Town Centre Hierarchy and Network



related investment should be focused into centres, where that focus means it can have maximum effect on vitality and viability in terms of spend (e.g. through linked trips promoted) and qualitative impact (e.g. on the accessibility of the environment), not least due to the accessibility and footfall already denoted by these locations. A clear corollary to this is that existing out of centre development should be encouraged to either fall away, or re-locate into centres.

- 6.246 The remainder of the strategy set out in this policy reflects the fact that firstly, Newham's main shopping/Town Centres currently account for only 57.3% of the borough's convenience and 62.3% of the borough's comparison expenditure, with leakage to centres outside the borough accounting for much of the balance. Secondly, within the borough, the south-east and northwest dominate in terms of market share, with Canning Town and Forest Gate operating particularly marginally, and Gallions Reach and other out of centre retail parks considerably boosting the expenditure secured by the Town Centres (Green Street, East Beckton and East Ham) in the south-west. This is the justification for proposed transformational change affecting the hierarchy at Canning Town (see Strategic Site and S14) - to secure a major shift in expenditure patterns to the borough's economic, social and environmental benefit. Such growth and change should draw out of centre spending back into town centres, notably in the south-west, and out of borough spending back within the area, particularly to Stratford. This builds on the opportunities presented by major investment already in train in these areas by Westfield at Stratford City, and by various regeneration partners at Canning Town, recognising the positive impacts these have on capacity through the added draw and consumer base they will create/have created.
- 6.248 East Ham, as Stratford's nearest competitor will also need to accommodate growth and change to retain its Major Centre status, building on its current strengths including a growing convenience role, good public transport connections as well as local walkability, and distinctive civic functions, and the availability of significant development sites (see Policy S6). This is also the case for the borough's other Town Centres, all of which need to at least renew their offer over the plan period to keep up with changing consumer trends and thereby continue to meet, or better meet local (and wider) needs within a reasonable distance, and contribute to a reduction in trade leakage. Although each town centre has seen some development, all have the capacity and strategic need for more, through strategic development sites, renewal of existing stock and the potential to increase densities. Green Street and to some extent Forest Gate have the most capacity for growth and diversification, compared to East Beckton which is in an area already well populated by comparison provision and other food stores. East Ham and Green Street have a particular need to increase the range of unit sizes available to ensure that they offer some new larger units to attract mainstream retailers with ranges suitable to the centre's role in the hierarchy, while also providing for smaller independents. Green Street however, also needs to accommodate the particular demand generated by its wider specialist destination status, whilst ensuring this occurs in such a way that the positive aspects of its character are enhanced.
- 6.248a There are accessibility issues in a number of Town Centres; Stratford, East Ham, Green Street and Canning Town. In Stratford improving the capacity of the station will be of critical importance as the population grows and infrastructure comes under greater pressure. In Canning Town it will be necessary for new development sites to include good access to the town centre across major barriers. There is a need for step free station access



to be provided in Green Street in addition to taking action to improve congestion in the town centre. In East Ham town centre, congestion issues and strategic transport needs need to be addressed in future development. Integration is another common theme, ensuring that centres operate as a cohesive whole –that is, so that the whole of a centre’s offer which gives rise to its position in the hierarchy and social infrastructure function is recognised and used.

- 6.249 Gallions Reach has always been regarded as an out of centre location in policy terms. However, the reality is that it accounts for a significant amount of spend and hence employment in the borough, is on the edge of an area of sub-regional population growth, and offers a qualitatively different offer to other nearby centres (Barking, East Ham and East Beckton). It is therefore proposed that it change to become a Major town centre as part of the development of the Beckton Riverside site which will increase its local trading potential, recognising its current deficiencies in terms of its limited range and offer, the dominance of access by car despite some improvements to bus usage, and a layout and design that cuts it off from nearby residential areas. Allocation of Gallions Reach as part of the wider site allocation for a significant new piece of urban development would allow for the various constraints that impact on the site to be managed to best effect and for the retail provision to be better integrated into the town centre network. Importantly, the immediate focus therefore should be on qualitative change and re-configuration rather than a net increase in floorspace, which should be closely linked to an increase in residents in the immediate Beckton Riverside area. Moreover, any changes in floorspace should be comprehensively masterplanned as part of wider changes to retail, residential and other employment, transport and utilities development in the area.
- 6.250 Analysis of the spatial distribution and accessibility of Local Centres from neighbourhoods across the borough, together with consumer survey data, reveals certain gaps in the network. In response to these gaps, development sites in accessible locations that should enable the establishment of new viable Local Centres serving new and existing communities have been identified. Elsewhere a benchmark of 400-800m (depending on the quality of the route) is used to denote accessibility within an easy 5-10 minute walk, in line with other policies promoting active travel, together with public transport access and consideration of the nearest alternatives. This benchmark and high footfall is deemed an appropriate locational criteria upon which to plan the establishment of other new local shopping, other commercial, and community service provision, rather than allowing it to come forward in an ad hoc dispersed manner which does not optimise viability.
- 6.251 Conversely, some groups of shops are found to be very limited in their offer and locational potential and hence scope for growth to include other community uses, but from a food access perspective, together with other clusters, they fill an important local role, where larger defined local or Town Centres are further away. This is the justification for a the lower level designation of Local Shopping Parade, with concern to protect retail rather than allow deterioration to a collection of hot food takeaways, as risks happening in some. The evidence base detailed in the 2014 paper Evidence Base - Local Shopping Parades, and the Options Appraisal (2015) sets out the justification for the designations and an analysis of the form and function of the parades.
- 6.251a Below this, in the more remote parts of the borough, where retail units are less commonly part of the urban fabric and there is insufficient scope for expansion, there are places

where isolated shops should also be protected, and exceptionally created, where there are no proximate strategic sites with scope to create more rounded provision, subject to appropriate capacity and impact testing.

6.251b A local threshold for impact assessment for out of centre proposals was recommended as per National Policy in the Newham Town Centre and Retail Study 2010 (updated in 2016). This is set low, reflecting in-centre development opportunities and Newham's particular problems with small-scale out of centre retail developments, with aggregate impacts on the definition of the town and local centre network, vulnerable centres and ground floor activation (unleivable voids - see Policies SP3 and J1).

6.251c The provision of publicly accessible toilets in new strategic development which incorporates local or town centres is an important way in which new development can benefit all members of the community. A lack of publicly accessible toilets can have a negative impact on the usability of a centre, particularly for certain groups such as older people, those people with disabilities and limiting long term conditions, and people with young children.

## Implementation

6.252 Developers will be expected to respond to this strategy in justifying their proposals and in their impact assessments and sequential tests (as per the NPPF/NPPG) when required.

6.253 Impact Assessments should include the impact of proposals on existing, committed and planned public and private investment in a centre or centres within the catchment area of the proposal. It should also include the impact of the proposal on town centre vitality and viability including in relation to local consumer choice and trade in the town centre and wider area up to 5 years from the time the app is made. For major schemes where 5 years is not enough it should be assessed up to 10 years.

6.253a The Council's 2016 borough-wide Town Centre and Retail Study is the latest evidence base which considers capacity projections although that capacity is likely to have changed in the meantime given the scale of population growth arising from new Strategic Sites, plan objectives to increase trade retention, and rapidly changing retail behaviour. We would expect proposals to respond to it (or any updates) using the figures<sup>1</sup> and updated

<sup>1</sup> Summary Table of Projections convenience/comparison at 5 year intervals:

Convenience Goods Floorspace	2020 (sq m net)	2025 (sq m net)	2030 (sq m net)
Global Capacity	3,479	7,879	10,632
North-west (Stratford)	2,338	4,420	5,738
North-east (Forest Gate)	38	81	88
South-west (Canning Town)	121	253	316
South-east (East Ham, Green Street and Beckton)	982	3,126	4,489

Comparison Goods Floorspace	2020 (sq m net)	2025 (sq m net)	2030 (sq m net)
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monitoring of commitments, and/or [particularly when the proposal is defined as Major as per the GDPO] reconciling their own borough-wide modelling with them. Developers will be expected to consider the relationship between the hierarchy of existing and proposed [town] centres and the catchments they serve. Retail impact assessment will be required where proposals differ significantly from the qualitative and quantitative parameters set out in the site allocations and spatial policies which are founded on this evidence base and its more detailed 2010 equivalent. Centre size and other benchmarks are defined broadly as per the London Plan in the glossary.

6.253ai Reference to 'proximate centres' is intended to encourage consideration of impacts beyond Newham's boundaries where relevant, whilst the criterion also highlights that within centre (particularly spatial) impacts must still be addressed even if the development accords with other aspects of the strategy. By spatial impacts it is meant impacts on how a centre functions spatially, for instance, whether the development encourages or discourages use of a particular part of a centre, affects how it is accessed or patterns of movement (e.g. pavement congestion), or affects how it operates in relation to its hinterland (e.g. affecting legibility/clear delineation of the centre or undermining of its focus). The likelihood of new floorspace being unlet and presenting as a void due to lack of evidence of market testing will also be a spatial impact consideration, as per SP3 and J1.

6.253b Integration and accessibility requirements are further discussed in the spatial policies, site allocations and INF2. Spatial policies (and Strategic Sites) also elaborate more broadly on the spatial vision for each centre, and should be read together with SP6 and INF5 as a more holistic statement of town centre policy.

6.253c Most sites for new local centres are identified as part of the relevant Strategic Site allocation. Where this is not the case, notably at Beckton Riverside, the same principles follow: new local centres should address access benchmarks and be located in areas of high footfall. The strategic principles, operating with national sequential test requirements, intend that new retail/town centre use provision is planned as part of new and existing centres; only where these, Local Shopping Parades or existing Protected Isolated Shops are not accessible (within 400-800 m depending on scale) should other small scale provision be proposed to service local needs. This might include circumstances where such centre-based provision has acknowledged access barriers, or could not address particular on site worker requirements.

6.253d Where opportunities arise through change of use or redevelopment to affect the future of a particular shop or other town centre use outside of a defined centre or Local Shopping Parade, and not otherwise protected as an Isolated Shop or Community facility (as per

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<b>Global Capacity</b>	25,904	65,907	110,325
<b>North-west (Stratford)</b>	20,371	52,392	87,369
<b>North-east (Forest Gate)</b>	195	535	890
<b>South-west (Canning Town)</b>	62	136	219
<b>South-east (East Ham, Green Street and Beckton)</b>	5,276	12,844	21,848

INF8), the presumption is that it will revert or convert to residential, as per Policy H1, particularly where it forms part of ribbon development along a Key Corridor as per SP7. Equally, where a non-retail use in a Local Shopping Parade is proposed for a change of use or redevelopment, the presumption is it will be re-provided as retail.

6.255 The Council and other public sector bodies will help secure the implementation of change on key Strategic Sites relevant to this network, deploying masterplanning, facilitation, development agreements and CPO powers as necessary whilst working with local businesses and business groups where possible.

6.256a The provision of publicly accessible toilets as part of strategic development refer to local or town centre development on strategic sites and will be secured through the development management process and the use of planning conditions.

## Monitoring

6.256b Output monitoring will make use of London Development Database data concerning development activity in the Plan area, in house activity monitoring and sample of decisions and appeals monitoring, whilst outcome monitoring will rely on more infrequent health checks and retail surveys. However, the Council also undertakes biennial town centre surveys which can be analysed by centre against the requirements identified above, and certain health check indicators such as vacancy. Resident engagement is also an important aspect of monitoring this policy.

### 6.256c Indicators

- i. INF – OP - 8 Strategic Management of Town and Local Centres:
  - a. Floorspace for– town centre uses [target: increase within town centres, subject to strategic regeneration ambitions elsewhere in the borough];
  - b. Town and Local Centre Investment [target: delivery of Strategic Sites sites in line with timescales envisaged in sites schedule and capacities in latest Town Centre and Retail Study];
- ii. INF – OP - 9 Use and Robustness of INF Policies:
  - a. Policy use and robustness [target: withstands appeal and is used appropriately in a sample of relevant decisions];
- iii. INF – OUT - 5 Rebalancing the Town Centre Network:
  - a. trade retention and expenditure distribution [target: increased trade retention and more even expenditure distribution, to be measured by updated survey within 5 years];
  - b. town centre health [target, stable or improved health as per different criteria, when benchmarked against other London centres; interim

assessment via biennial local survey work according to individual centre requirements by the policy].

## INF6 - Green Infrastructure & the Blue Ribbon Network

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles & Spatial Strategy:

- a. Green infrastructure and the Blue Ribbon Network will be protected and enhanced. For the purposes of this protection (and to be read in conjunction with policy SC4), the sites and features identified in Appendix 3 and shown on the Policies Map are designated as Protected Green Space;
- b. The multiple roles and benefits of designated and undesignated Green Infrastructure will be maximised and promote implementation of policies SP2, SP5, INF7, SC1, SC3 and SC4;
- c. A 'green grid' approach will be promoted, with new and enhanced spaces - notably as part of the Lea River Park (GI-1) - adding to the connectivity established along rail and river corridors, the Greenway (GI-4), and the chain of Metropolitan Open Land in the east of the borough (GI-2/3)<sup>1</sup>; and
- d. Residential and visitor moorings will be supported where need can be demonstrated outside of SIL and LIL areas in accordance with H3 and J1.

### 2. Design and technical criteria:

- a. In effecting the need to protect green and blue infrastructure, there should be no net loss of functionality, taking into account cumulative impacts and the multiple roles and benefits of such infrastructure (including quantum where this is material to its function); and
- b. Development in the vicinity of the Lea Valley Regional Park should contribute to implementation of its adopted plans.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles and Spatial Strategy.

### Justification

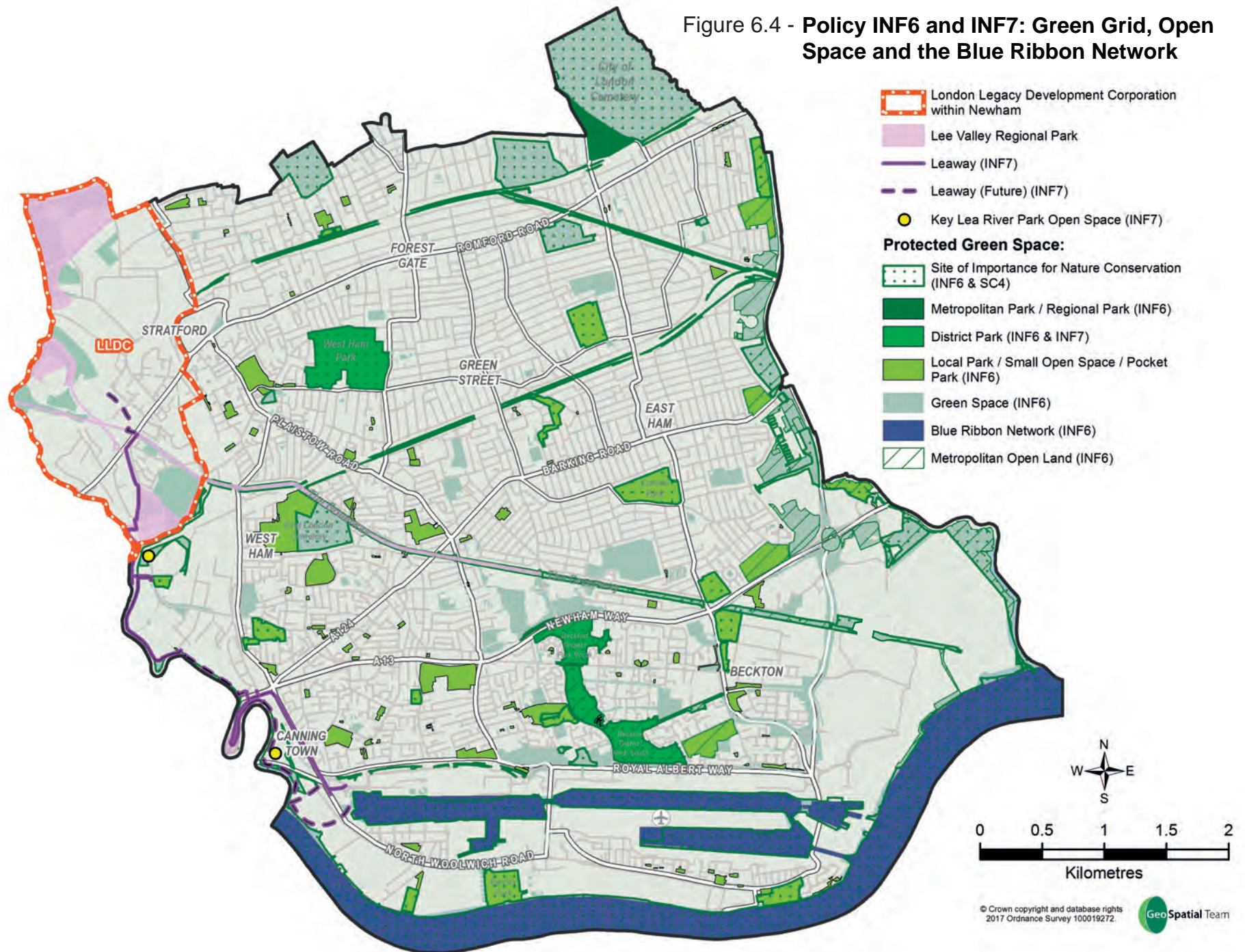
6.256 Green infrastructure (GI) comprises the green spaces and features (street trees, and living roofs for example) that together form a living network with a multitude of benefits. Green infrastructure can enhance not only biodiversity and habitat provision, but also improve drainage capacity and reduce flooding, cool the urban environment (helping to reduce the urban heat island effect), contribute to local and historic character, tourism potential and visual amenity, and have both physical and mental health benefits, including through encouraging walking, cycling, and other leisure and recreation activities. The importance of

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<sup>1</sup> 'GI' references refer to the Key Diagram at the start of this plan



Figure 6.4 - Policy INF6 and INF7: Green Grid, Open Space and the Blue Ribbon Network



green infrastructure has been highlighted by the creation of a Green Infrastructure Task Force for London and the resulting report 'Natural Capital, Investing in a Green Infrastructure for London', and its importance is recognised in London Plan<sup>2</sup> and national policy and guidance<sup>3</sup>.

- 6.256a The Blue Ribbon Network (BRN) is significant in Newham, incorporating the rivers Thames, Lea, and Roding as well as the Royal Docks. The BRN is a similar form of, and in some cases overlaps with, [green] infrastructure, performing an equivalent variety of roles (environmental and social) and therefore worthy of the same protection and enhancement.
- 6.256b The promotion and protection of green and blue infrastructure within this policy contributes to the delivery of high quality places people can enjoy living in (plan objective 2), to good growth by improving the environmental impacts of development (e.g. through drainage enhancement, or the preservation of habitats) (objective 3), and to optimising the benefits of development for local people, ensuring green infrastructure is not functionally eroded and new provision is delivered (objective 1).
- 6.256c Newham has an emerging 'green grid' but growth will inevitably mean increased pressure on green spaces and other forms of GI, both in the numbers of people wanting to access them and in competing demands on land use. Promotion and enhancement of the green grid is therefore encouraged, which will include improving connectivity to and between existing spaces and features as well as delivering new contributions. In doing so, the impact of green infrastructure interventions are enhanced, even when quantitative opportunities are limited. This is particularly the case in Urban Newham, which will also need to secure improved access to new and existing (in some cases inaccessible) larger green spaces in the Arc of Opportunity and in the east of the borough to help address existing and emerging deficiencies. The Lea River Park is a project highlighted in the IDP of particular significance in this respect. Even without public access however, green chain links should be protected and promoted given benefits to biodiversity, and, research also shows that merely being to see GI features such as trees can have health benefits.

## Implementation

- 6.256d Given the desire to maximise the benefits of green infrastructure and the cross-cutting nature of those benefits, GI decisions should also be informed by policies SP2, SP5, INF7, SC1, SC3, and SC4. In line with SC4 requirements relating to the protection of habitats and designated SINC for instance, increasing public access is not always preferred and should be weighed against environmental protection objectives.
- 6.256e The policy sets out a general presumption of protection which means that loss of green and blue infrastructure will be resisted and adverse impacts mitigated. However, where the functionality of GI can be enhanced, the alteration of existing designated and undesignated assets will be considered. Where the designated green space is publicly accessible and contributing to the adequacy of open space access of Newham's existing and future residents (see mapping in INF7 and subsequent updates published as part of IDP updates), any changes should lead to no net loss in quantum (note that this specifically

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<sup>2</sup> Policy 2.18

<sup>3</sup> <https://www.gov.uk/guidance/natural-environment#para027>



applies to playing fields). Generally changes to GI and their impact on its functionality will need to be assessed in light of engagement with users and others benefiting or with the potential to benefit from GI, management bodies and other experts (such as the Environment Agency and Natural England). This will be reflected in updates to the Green Infrastructure database (based on Appendix 3 of this plan), to be hosted on Newham's website. The IDP will also highlight particular enhancement projects.

6.256f The Blue Ribbon Network likewise has its own custodians and regulators in Newham, including the Environment Agency, Port of London Authority (PLA), Canal and River Trust, Marine Management Organisation (MMO) and Royal Docks Management Authority (RoDMA). Proposals affecting these assets should therefore be discussed at an early stage with such bodies, whose advice will be taken in the assessment of proposals. The MMO delivers UK marine policy objectives for English waters through statutory Marine Plans and other measures. Newham is within the South East Inshore Marine Plan area for which a plan will be prepared at a future date. Until the relevant Marine Plan has been prepared, the UK Marine Policy Statement should be referenced for guidance on any planning activity that includes a relevant section of coastline or tidal river (extent shown on the map attached to Policy SC3). Proposals should also have regard to the objectives of the Thames River Basin Management Plan as per policy SC2.

6.256f.i Proposals incorporating new moorings should cross-reference INF1 and associated implementation advice.

6.256g The Lea Valley Regional Park Authority's area extends into Newham as shown on the Policies Map; development in the vicinity of the LVRPA area should therefore have regard to the actions set out in its adopted plans, specifically in relation to the biodiversity impacts of development and across sites related to delivery of the Lea River Park.

6.256h The Lea River Park is a sub-regional project being delivered by the LVRPA, the London Boroughs of Newham and Tower Hamlets, the GLA and London Legacy Development Corporation. Further detail is found in the IDP and Lea River Park Primer, Design Guide and Curatorial Approach documents published on the Council's website, which should be referred to in locations in the Lea Valley which may contribute to or otherwise affect its delivery. These are further signposted in the spatial policies and relevant Strategic Site Allocations set out in Appendix 1.

## Monitoring

6.256i Monitoring the effectiveness of the policy will focus on consents and other known activity relevant to the policy objectives. The London Development Database requires monitoring of all open space losses and gains which is useful here; however BRN impacts are more difficult to gauge other than indirectly via consultee commentary. Similarly, there is presently no satisfactory way to monitor all contributions to GI enhancement through new development, but focusing on those aspects that add to the connected green grid and that otherwise affect protected green space that would be recorded in the DB are nonetheless useful to inform policy review and to help scope further projects by the Council and its partners. In addition, engagement activity, particularly with local residents, will seek to bolster the GI/blue ribbon database to better understand components of functionality for each [water]space. There is no outcome indicator specific to this policy, given a full

borough-wide green/blue infrastructure audit is too great a task to be an expected component of monitoring, with outcomes instead be reflected in other indicators concerning health and well-being, biodiversity, flood risk and climate change resilience, and satisfaction with parks.

6.256j Indicators:

- i. INF-OP-10 Green and Blue Infrastructure Protection and Enhancement:
  - a. Protection of Green Infrastructure [Target - via monitoring of consents - is no net loss of protected green space area and/or trees unless not affecting functionality, and no unresolved objections from BRN custodians];
  - b. Delivery of Lea River Park projects [Target – IDP milestones];
  - c. Other Green Grid Enhancements [No specific target, but monitor consents and other related interventions for additions to connectivity, quantity and quality relevant to the GI database];
- ii. INF-OP-11 Policy Use and Robustness [No specific target, should be using regularly if effective, and supported at appeal].

## INF7 - Open Space & Outdoor Recreation

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

### 1. Strategic Principles

- a. Encouraging active use, including through improvements to the quantity, quality, accessibility and connectivity of open space and the blue ribbon network throughout the borough;
- b. Realisation of the Lea River Park vision, achieving regional park and/or Metropolitan Open Land status; and
- c. Parks, allotment and playing pitch deficiencies (refer to SP9 and the IDP) will be reduced, with major developments incorporating provision that meets their own needs and where appropriate, contributes to wider needs. Key priorities include District and Local Parks and provision within the Arc of Opportunity.

### 2. Spatial Strategy

- a. Existing open spaces (including riverside access, allotments and burial space) and outdoor recreation facilities will be protected as per INF6 and 8;
- b. New open spaces and outdoor recreation opportunities will be delivered primarily on Strategic Sites and along the Blue Ribbon Network, including but not limited to those contributing to delivery of the Lea River Park<sup>1</sup> and Thames Path; and
- c. The emerging green grid will become increasingly publicly accessible (where compatible with SC4) and contribute to connectivity in the borough and beyond, building on the roles and opportunities presented by the Greenway and Leaway, (see INF1 and INF2), the green chain of Metropolitan Open Land in the East of the borough, and continuity of river corridors

### 3. Design and technical criteria

- a. Infrastructure to improve the quality and accessibility of open space will have minimal impact on the open-ness and other valued qualities of the space as per SP1, SP2, SP5, SC4, INF6 and 8;
- b. Open spaces should be designed to enhance urban cooling and biodiversity (see SC1, SC4 and INF6) and play a role in flood water storage and drainage (see SC3 and the SFRA);
- c. Open spaces and outdoor recreation facilities should be designed to be inclusive and accessible as far as possible, delivering welcoming spaces that consider affordable access, flexible use, security, and availability / provision of publicly accessible toilets. Proposals should include provisions for sustainable ongoing management and maintenance;

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<sup>1</sup> Specifically significant open space at Bromley-by-Bow Gasholders (S11) and the Limmo Peninsula (S18)

- d. The requirement for Play and Informal Recreation Space to be provided for as part of new residential developments as per the Mayor of London's SPG or subsequent updates; and;
- e. Further to the set-back specified in SC3, developments located adjacent to the Blue Ribbon Network should integrate with and enhance the waterside environment, providing improved amenity space and access to the waterfront while facilitating safe and active use of the waterspace. This will include provision of riparian lifesaving equipment where necessary; and
- f. Developments within 6.2km of the Epping Forest SAC with the potential to give rise to significant recreational disturbance impacts (bearing in mind likely travel routes) should undertake an assessment of impact on the SAC.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles

### Justification

- 6.272 Access to open space and outdoor recreation is an essential part of high quality, healthy, liveable places; as such this policy contributes directly to the achievement of plan objective 2. In line with aims to make the borough a place people will choose to live, work and stay, this policy addresses open space deficiencies and encourages provision that keeps up with growth. As population levels increase so will pressures on existing spaces, particularly true of the Arc of Opportunity given the relative scarcity of park space in this historically industrial area, and in Urban Newham where there is more limited opportunity to provide new open space. As such, the policy also contributes to the delivery of good growth (objective 3) by ensuring essential social infrastructure provision is increased in tandem with population growth. Open space is of particular importance in an urban setting like Newham, and arguably of even more importance to a population facing multiple forms of deprivation (whereby the means to travel to other locations or spend money on leisure and recreation may be impaired). As such, the policy also contributes to objective 1, ensuring that development is not at the expense of existing open spaces or outdoor recreation facilities, their function, or the user groups that benefit from them.
- 6.272a This policy seeks not only to ensure that new development contributes to the provision of open space by meeting its own needs and where relevant wider needs, but also to deliver access and usability/qualitative improvements to existing spaces, recognising that in some cases these are a good substitute for quantitative enhancements which are difficult in more built up areas (notably in Urban Newham). They may also be more relevant to the health and well-being outcomes sought from the encouragement of active use of open space/water-space. At present the borough has large extents of open space and water-space not accessible to the public or providing any discernible social benefits (in the east of the borough in particular). While improving access needs to be weighed against environmental, health and biodiversity considerations (i.e. where habitats may be valuable



Figure 6.5 - Policy INF7: Areas of Small Open Space/  
Pocket Park Deficiency

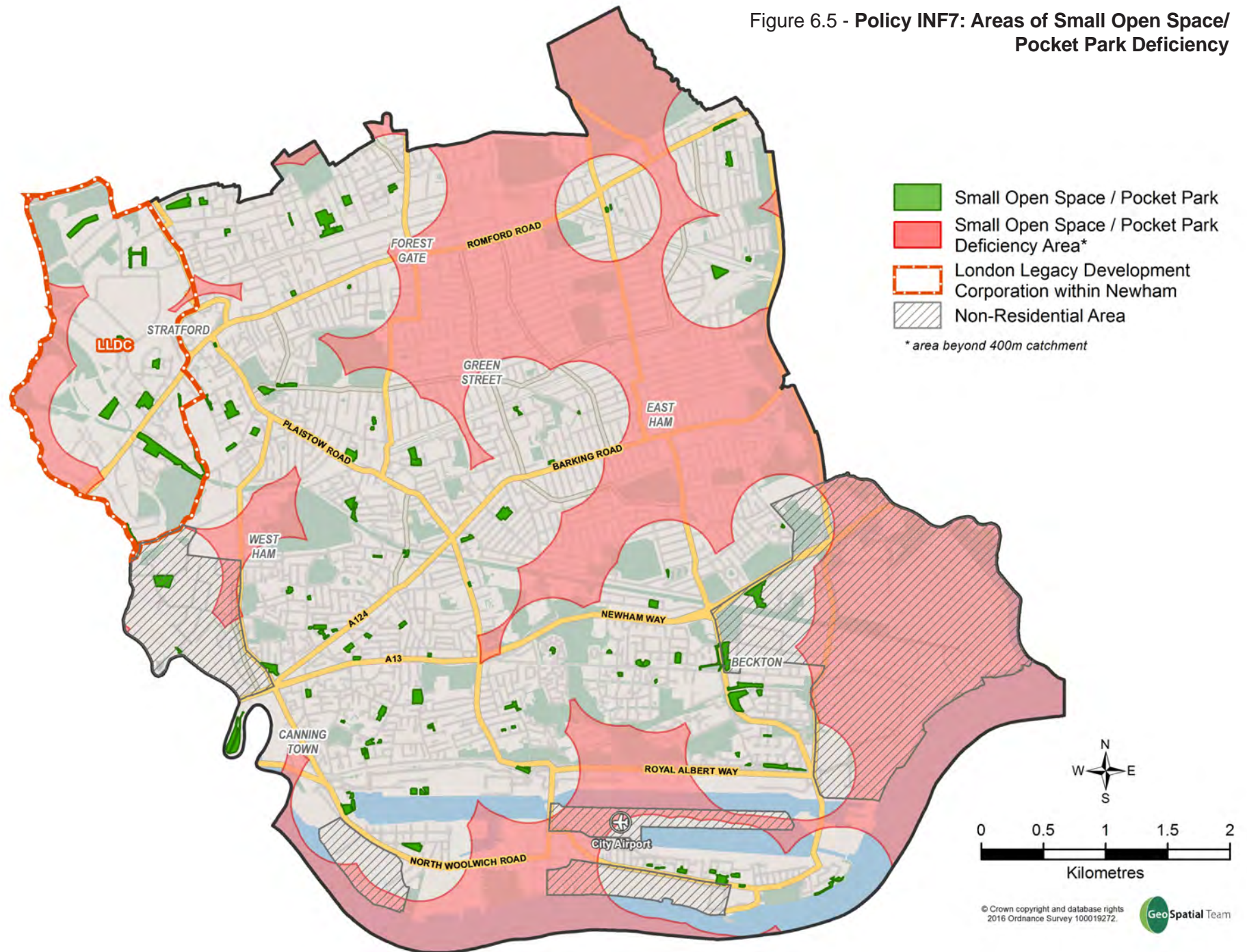
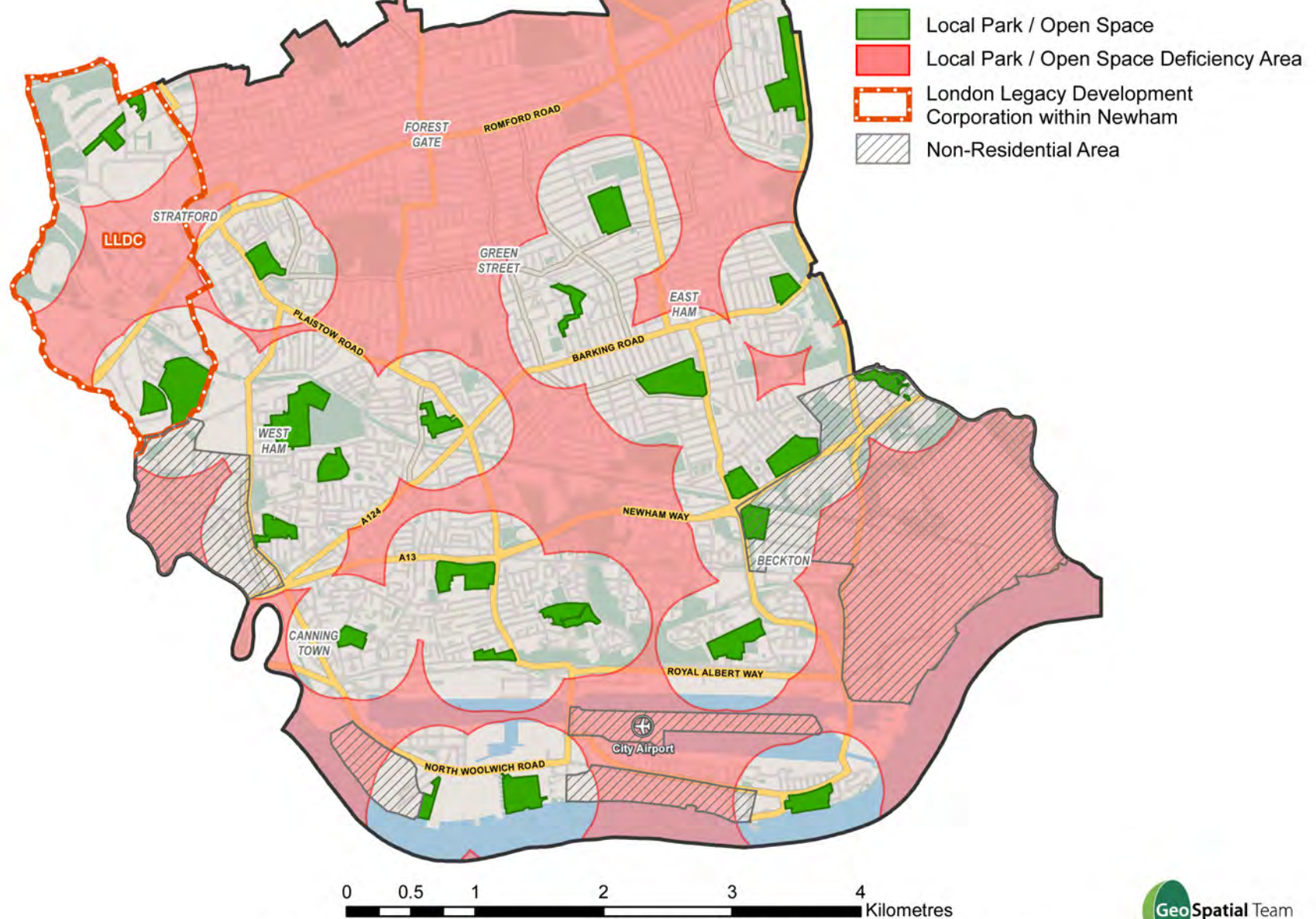




Figure 6.6 - Policy INF7: Areas of Local Park/  
Open Space Deficiency



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Figure 6.7 - Policy INF7: Areas of District Park Deficiency

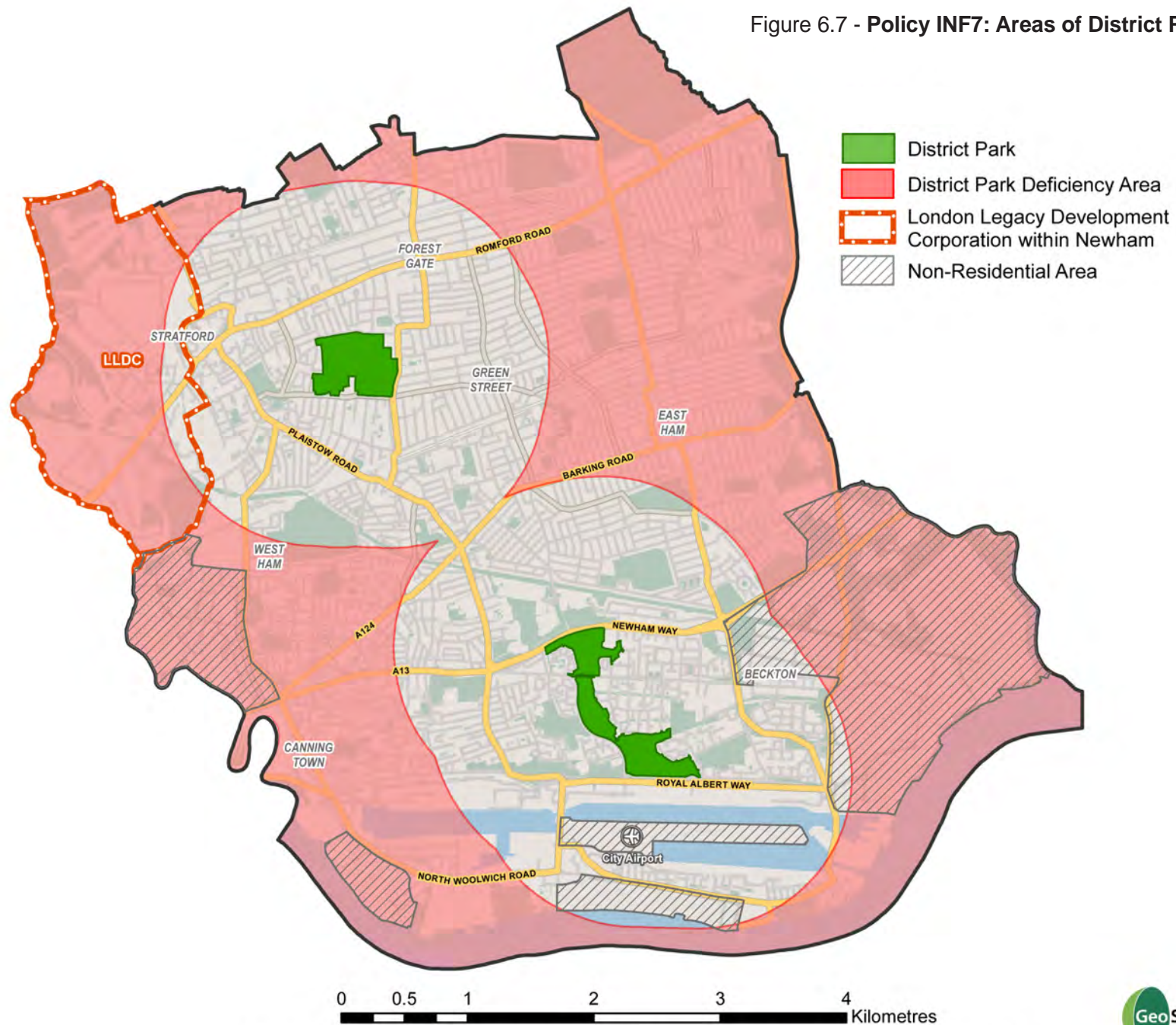
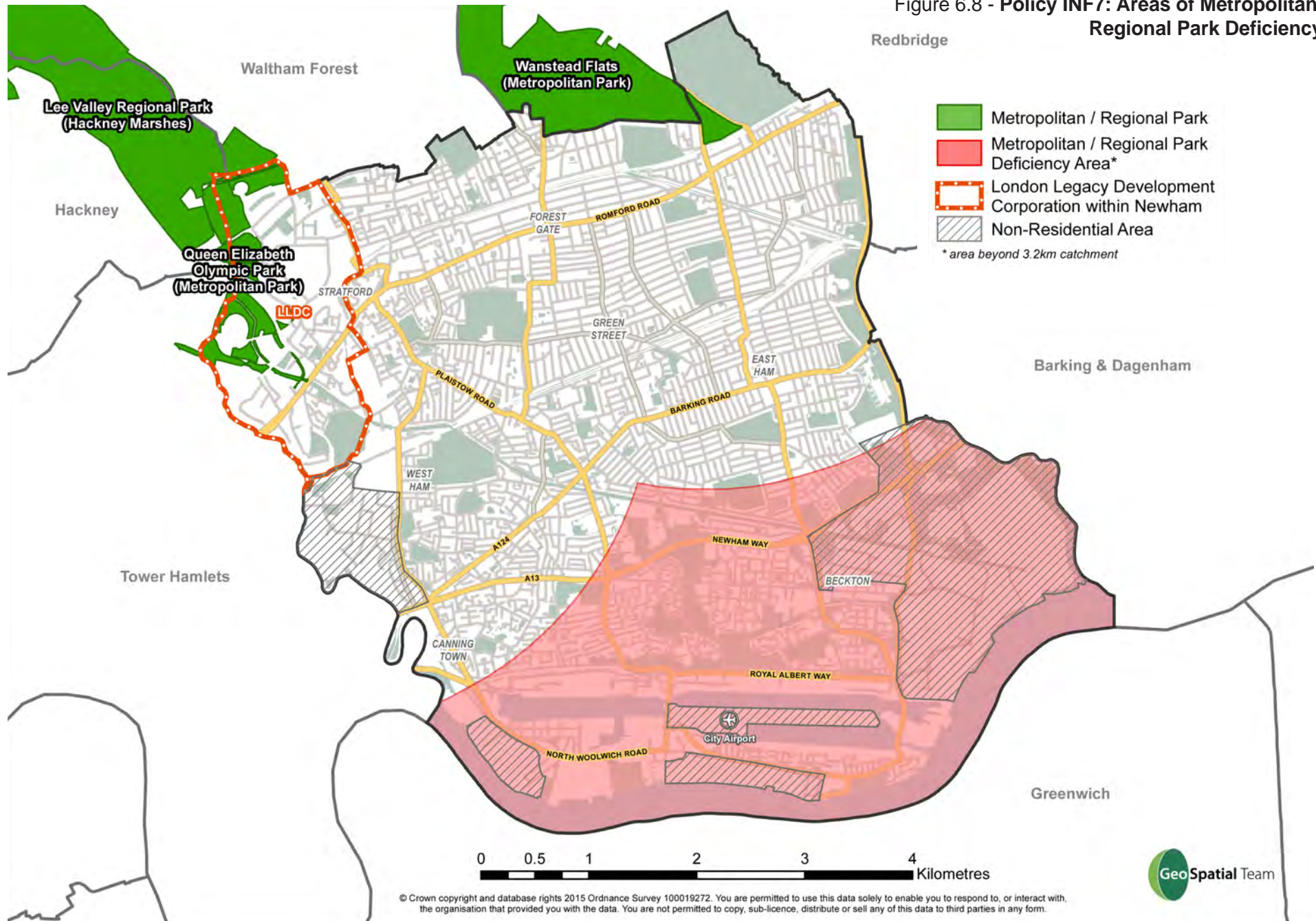




Figure 6.8 - Policy INF7: Areas of Metropolitan/ Regional Park Deficiency





or land contaminated) it is an essential part of delivering better open space and outdoor recreation provision in Newham. Potential applicants should liaise with landowners, the GLA, and relevant commissioners (LBN, or City of London corporation for example) to realise aspirations for the improved accessibility of MOL. Tackling known causes of under-use (whether in general or by particular groups) such as lack of provision of particular facilities or attractions, will also be relevant to policy objectives, ensuring that everyone benefits from active recreation opportunities.

## Implementation

- 6.272b Parks deficiency is defined according to London Plan benchmarks<sup>2</sup> and mapped above, with updates to be published as part of IDP review. The benchmarks highlight particular deficiencies in local and district park access – the former in Urban Newham, the latter particularly in the east and west of the borough. Development should respond to expected levels of growth, meeting its own needs as well as addressing existing deficiencies. Even where existing access to open space meets distance benchmarks, population growth will lead to increased pressure on those spaces, which should be accounted for as per INF9 with reference to the IDP which sets out strategic parks management projects to enhance quality and accessibility, and hence absorb increasing recreational pressure. Developers should also be aware, as per INF9 and S1, that there is a particular onus on sites in the Arc to make strategic contributions to open space and outdoor recreation, given more limited opportunity in Urban Newham. Developers will need to refer to latest IDP updates.
- 6.272c Improving the quality and accessibility of open space and the Blue Ribbon Network will include infrastructure for walking, cycling, river access, crossing and mooring. Proposals alongside the BRN should demonstrate that the need for riparian lifesaving equipment has been considered, with any required installations meeting recognised standards<sup>3</sup>; consultation with the Port of London Authority (PLA) should be evidenced. For further detail around the purpose and status of the Thames Path refer to PLA vision documents<sup>4</sup> (specifically ‘priority action 4’) and TfL information<sup>5</sup>.
- 6.272c.i The availability of current or additional local recreational opportunities, may also be relevant in assessment of any likelihood of recreational green space demand impact on Epping Forest SAC. The need for HRA screening in relation to potential impacts on the SAC is signposted as relevant within the Strategic Site schedule (Appendix 1, ‘constraints and other advisory information’). Whilst the requirement for an HRA is not generally considered relevant to sites of lesser scale, whether or not such an assessment is required for Major schemes should be the subject of pre-application discussion with the Local Planning Authority.
- 6.272d For the purposes of part 2a of this policy, ‘existing open spaces’ is defined as those elements of designated green space (see Appendix 3) that are publicly accessible.
- 6.272e Opportunities for food growing, including as ‘meanwhile’ uses that do not jeopardise the overall redevelopment of allocated sites, are encouraged in line with local resilience aims.

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<sup>2</sup> currently Table 7.2

<sup>3</sup> refer to latest PLA guidance.

<sup>4</sup> <http://www.pla.co.uk/About-Us/The-Thames-Vision>

<sup>5</sup> <https://tfl.gov.uk/modes/walking/thames-path>

Demand for allotments is consistently unmet throughout the borough, as such allotment deficiency applies across Newham. Where new Council research indicates the issue is acute in certain areas this will be reflected through updates to the IDP.

6.272f The Playing Pitch Strategy (2017) identified deficiencies in playing pitch provision across the borough, including consideration of the likely impacts of population growth throughout the plan period. This has informed requirements set out in the IDP. Where deficiencies are identified, development will make contributions to enhance provision in line with need, to be secured through the development management process and legal agreement.

6.272g Given its strategic significance, development of sites integral to the Lea River Park will enable delivery of the vision, including through open space provision and Leaway connectivity. Developers should refer to Lea River Park guidance documents (primer, design guide, and curatorial approach) available on the Council's website.

## Monitoring

6.272h Monitoring the efficacy of this policy will include specific indicators relating to amount of open space as well as resident satisfaction with the borough's open space provision. Reporting will draw from review of consents (examining losses and gains as monitored through the LDD), S.106 reporting (looking at financial contributions to enhancement), and independent surveys commissioned by the Council regarding satisfaction with parks. The output indicators relating to INF6 are also relevant. Ongoing informal engagement with residents and elected members will also provide useful feedback in relation to the success of open space and outdoor recreation provision. Mapping of parks deficiency will be updated as new development emerges in the Arc of Opportunity; these will be published as part of ongoing IDP review (see INF9).

### 6.272i Indicators

- i. INF-OP-11 Policy Use and Robustness [No specific target, should be using regularly if effective, and supported at appeal];
- ii. INF-OP-12 Open Space and Outdoor Recreation Opportunities:
  - a. Open space losses and gains (defined as designated/protected spaces that are publicly accessible or new spaces that are publicly accessible and suitable to be designated in further rounds of plan review) [No specific target, should be positive or steady];
  - b. Contributions to open space / outdoor recreation improvements secured through S.106 [No specific target, should be positive or steady];
- iii. INF-OUT-6 Satisfaction with Parks Trends in park use/ratings/non-use within Liveability Report (Section 4.13 'Parks in Newham') and/or Newham Annual Residents Survey ('What is your opinion of parks and open spaces?'). [No specific target, should be positive or steady].

## INF8 Community Facilities

Proposals which address the following strategic principles, spatial strategy and design, management and technical criteria will be supported:

### 1. Strategic Principles

- a. Community facilities development and growth will be co-ordinated to ensure that the delivery and retention of community facilities is carefully managed—in order to align provision with the needs of new and existing communities in the borough (as per INF9 and H1);
- b. Retaining or [re-]providing community facilities where a local need exists, that can be clearly demonstrated;
- c. Ensuring all new community facilities are accessible, welcoming, inclusive and open and available to all members of the local community, with sufficient capacity and flexibility to meet a range of local needs;
- d. Co-locating facilities and services, and encouraging mixed use formats incorporating new or enhanced community facilities and other compatible and policy compliant uses notably housing to help support viability, security and efficient land use;
- e. Promoting innovative ways of addressing constrained sites such as the use of shared facilities, meanwhile provision on Strategic Sites, off-site and multi-storey provision; and
- f. Prioritising the provision of health, childcare and education facilities where an element of community floorspace is proposed on Strategic Sites.

### 2. Spatial Strategy

- a. Ensuring all community facilities are located in places that are or will be accessible by a range of means of transport, including walking and cycling;
- b. Prioritising town and local centre sites for the development of community facilities where compatible with Policy SP6, but allowing exceptions to this, subject to the satisfaction of other criteria, where proposals:
  - i. Do not result in a loss of housing as per Policy H4 or designated employment land as per policy J2, and are otherwise compliant with other policies; and
  - ii. Are meeting a localised need, are smaller than 75 sq. m and staff and facility users occupying the building at any one time do not exceed 15 people; or

- iii. Will be adding to existing facilities to help form a recognisable 'hub' or 'cluster' meeting localised needs; or
  - iv. Will result in the protection of a public house for an alternative local community benefit with a similar catchment area; or
  - v. Relate to the operational needs of emergency services provision; or
  - vi. Are ancillary training or childcare facilities for employers within employment hubs; or
  - vii. Are Class D1 uses located within the defined Community Facilities Opportunity Areas (CFOA) as set out in Table INF.C when it can be demonstrated that there are no available or affordable in-centre premises or sites;
- and

- c. To promote the delivery of community facilities in accordance with identified need the health, education and flexible community facility sites listed in Table INF.D, have been allocated for new, re-configured or intensified facilities, incorporating other compatible and policy compliant uses where appropriate as per INF8:1e above, in addition to provision accounted for on the Strategic and non-Strategic sites (as listed below the table).

### 3. Design, Management and Technical Criteria:

- a. Facilities must be outwardly looking, address the street and neighbourhood in their design so that they are obvious and welcoming within the urban grain, subject to design and character considerations;
- b. Proposals shall set out design and management measures detailing how outside of ~~its~~ their principal use and any sacred areas, the facility would operate as a multifunctional space with fair and affordable access to all members of the community;
- c. Proposals for new or intensified community facilities should demonstrate that they take account of other public infrastructure providers' / commissioners' expressed needs and scope for co-location;
- d. In order to demonstrate local need for new, intensified or replacement community facilities (typically D1)-proposals should be accompanied by evidence including:
  - i. that at least 67% of users will be ordinarily Newham residents and that existing facilities cannot meet the identified need, taking into account the need to consider innovative approaches to provision, including alternative models in relation to scale and scope, in Urban Newham; or

- ii. published sufficiency assessments, strategic infrastructure plans or capital programmes including the latest IDP as reflected in Community Infrastructure and Strategic Site site allocations; or
  - iii. where the facility is commercial D1, D2, A4 or sui generis, compliance with town centre policies, including reference to the latest capacity studies;
- and
- e. Where the release of a community facility building or site to other uses is proposed, evidence must be provided that the facility has been either:
- i. assessed and identified as surplus as part of a broader strategic approach changing the model of provision that is considered to be of local benefit, (e.g. aligned with other Local Plan Core Strategy objectives) and may be necessary to help realise that strategy, having first drawn it to the attention of public providers and offered it to them as per ii below; or
  - ii. offered to the market for the range of existing lawful uses (typically Class D1) for a period of six months, at a market rent or sale price benchmarked against at least three other equivalent properties in the area. This will include drawing it to the attention of public providers and allowing for a mixed use 'compromise position' where it can be marketed for a replacement facility plus other uses such as residential; or
  - iii. shown to be unsuitable in size and scale for its location in relation to the spatial strategy prioritising Town and Local Centres as locations for community facilities, where the local area has good access to a Local/Town Centre and facilities which meet similar local needs where these arise.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Spatial Strategy; 3. Design, Management and Technical Criteria paragraphs d and e only.

Table INF.C

CFOA reference	Area
CFOA1	East Ham
CFOA2	Canning Town
CFOA3	Forest Gate
CFOA4	Beckton
CFOA5	Stratford
CFOA6	Manor Park

Table INF.D

Reference	Site	Primary community need as per IDP 2018*
CF01	Tollgate Medical Centre	Health
CF02	West Beckton Health Centre	Health
CF03	Lord Lister Health Centre	Health
CF04	East Ham Memorial Hospital & Shrewsbury Road Medical Centre	Health
CF05	Balaam Street Practice	Health
CF06	Bow County Court	Health
CF07	Scott Wilkie Primary School	Education
CF08	Eleanor Smith Lawson Close	Education
CF09	Eastlea Community School & Star Primary	Education
CF10	Royal Road	Education
CF11	Brampton Manor Academy	Education
CF12	Langdon Academy	
CF13	Forest Gate Community School	Education
CF14	Site at Flanders Road	Education
CF15	Eleanor Smith Primary School (North Road)	Education
CF16	Tunmarsh Centre	Education
CF17	Colegrave Primary School	Education
CF18	NCFE Welfare Road	Education
CF19	Sarah Bonnell School	Education
CF20	New Vic	Education
CF21	Odessa Infant School and St. James Primary	Education
CF22	Maryland Children's Centre and Primary School	Education
CF23	Former Rainbow Centre	Community Centre / flexible community use
CF24	Former Upton Centre/One Love Site	Community Centre / flexible community use
CF25	Manor Park Community Centre	Community Centre / flexible community use
CF26	Katherine Road Community Centre	Community Centre / flexible community use
CF27	Barking Road Centre	Community Centre / flexible community use
CF28	Newham Leisure Centre	Leisure – built facilities

*\*may be subject to updates*

*[See also mixed use Strategic Sites S01, S03, S04, S05, S06, S08, S10, S11, S13, S14, S15, S19, S21, S22, S23, S24, S26, S27, S28, S29, S31 and non-strategic site HSG23]*

## Justification

- 6.278 Community facilities are defined for the purposes of this policy as education (from pre-school to further and higher education) and training, health, older people's housing and specialist provision for other vulnerable people (falling into Use Class C2), social, leisure, children's playspace, playing pitches and fields (including MUGAs) and associated facilities, places of worship, burial spaces, community spaces (including pubs lawful D2, A4 and certain Sui Generis uses, public toilets), cultural and civic uses (including criminal justice and court facilities) and emergency services.
- 6.279 Achieving good growth, and an active and connected community supporting resilience and convergence objectives is about ensuring that residents and businesses have the local infrastructure and services they need and that give them choice about how they access services to maintain and improve quality of life. The Infrastructure Delivery Plan (IDP) sets out the assessed need for increased capacity in relation to healthcare, education and childcare in the borough. These are essential components of the community facility network and will be prioritised in order to ensure the needs of the borough are met. These and other identified community facilities needs – for provision to expand, be newly provided, or in some cases be re-configured/oriented - are reflected in Strategic and non-Strategic site allocations where need in the plan period and scope (for development/intensification etc) is known. Key for the borough are new education, healthcare and flexible community facilities, many of which provide an element of childcare.
- 6.279a To ensure that community facilities make the most effective use of land, a key component of the policy is to ensure that facilities meet local need. This is relevant to both the assessment of proposed new facilities on Strategic Sites and elsewhere, as well as the assessment of the appropriateness of loss of land/premises with lawful community facility use, careful location and design and management to ensure facilities will continue to meet [potentially changing] need over time, and preferably meet a range of needs at any one time, being inclusive, accessible, welcoming and flexible.
- 6.279b Co-location of facilities and services alongside other policy compliant uses, notably housing, can also achieve land use efficient and be beneficial for the viability of a facility, given residential land values. It could also be deployed to help address recruitment difficulties for key workers as well as enhancing overall security. Given evermore constrained sites, the policy also promotes the use of innovative solutions including meanwhile provision on Strategic Sites to enable redevelopment of an existing site. Other innovative solutions could include the use of shared facilities or multi-storey provision (such as roof top playgrounds), or in some cases off-site shared provision of playing pitches and other facilities.
- 6.281 There are also moves towards commissioning and personal models of service provision, customer access strategies, shared services and greater collaboration, both within the public and local community sector. The Council and other commissioners/providers will therefore need to carefully consider the use of its existing assets and work together with partners, including the private and voluntary sector to deliver quality services with effective use of land and buildings. This is particularly relevant when considering asset disposal, given that what might be surplus to one provider could be used by another, as



well as new facility provision, where opportunities for co-location may be evident.

- 6.287a Town and local centres, within accessible areas, are prioritised for the location of community facilities, helping to promote access to services across the Borough in accordance with the wider vision and spatial strategy. That said, policy criteria recognise particular circumstances where there is the potential and logical justification in light of other policy objectives and recognised delivery realities for the location of community facilities elsewhere, subject to careful management of impacts via tight criteria.

## Implementation

- 6.288a Policy will be implemented via the development management process, with the expectation that proposals are accompanied by supporting statements and a management plan that detail responses to the relevant criteria; these will be secured by conditions or legal agreement as appropriate. Other policies to which there is a logical link are highlighted, encouraging responses that deal with the issues in an integrated way.
- 6.289 The Council will use its land and buildings to provide community facilities, in response to local needs, where appropriate in partnership with other public agencies, the private sector and the voluntary sector. In line with the corporate community cohesion and sustainable communities approach, the Council will continue support the facilitation of inter-group working to make co-use and -development possible to meet local needs.
- 6.289a The policy seeks to ensure that applicants consider how best to maximise the effectiveness of community facilities not only through careful design and management, but also in the context of the broader spatial strategy which balances the need for community facilities with other demands on land. Early consideration of design, locational and needs based justifications will be explored through pre-application advice and design review.
- 6.289b Recognising the importance of publicly accessible toilets for many members of the community, provision of these will be one way of demonstrating that a facility is welcoming, inclusive and open and available to all members of the local community.
- 6.289c The policy allows for the provision of community facilities under certain specific circumstances in out of centre locations where it meets a localised need. In relation to childcare provision the term 'facility users' refers to children and not parents. Applicants will be expected to demonstrate that the users of the facility will not exceed 15 people at any one time. Should the facility experience growth in demand and seek to exceed 15 uses or extend beyond 75 sq. m of floorspace, an alternative site/premises must be sought within an appropriate town/local centre location
- 6.289d Within supporting statements, applicants are required to provide both qualitative and quantitative evidence to allow local need to be assessed, recognising the difference between a group's need and market opportunities, and local need. The IDP will form an important part of demonstrating sufficiency of or requirement for community facilities across the borough throughout the plan period due to the live nature of the document which will be updated annually to ensure it remains current. In relation to applications for the loss of community facility floorspace, peppercorn rents as a demonstration of market rent, are not acceptable. In the case of release of playing pitches or fields, as per the NPPF,

part 3.e.i of this policy will be the required test; this should be applied in conjunction with policy INF6 which sets out a presumption of protection for all designated green space.

6.289e When proposing facilities within CFA areas, applicants are expected to evidence a lack of suitable available and affordable sites within in-centre locations and be able to demonstrate a clear end user of the facilities. Proposals for speculative D1 development are not considered to be acceptable within Community Facilities Opportunity Areas.

6.289f In setting out a presumption in favour of health, education and childcare facilities on Strategic Sites, it is intended that community facilities floorspace in these areas be offered to relevant providers first. Where they do not require floorspace on the site, or where additional community facilities floorspace is proposed that would be surplus to their needs, provided that the applicant can adequately meet other policy criteria, including that which relates to demonstration of local need, the policy does not preclude floorspace coming forward for other community uses. There are a number of Strategic Sites which include specific requirements for the provision of community facilities within the sites to meet needs arising (from the site or the site and wider area) notably: Connaught Riverside – S23, Thames Wharf – S08, Coolfin North – S06, and Beckton Riverside – S01 (where education facilities are specified), and Queen’s Market – S27 (where healthcare is specified in the site allocation). It is expected that location, scale and format of the facilities within the site will be agreed in the course of masterplanning in consultation with commissioners/providers through the pre-application process. In turn it should be noted that further community facilities needs may be identified as part of the iterative process of capacity testing on these sites (as per INF9 and INF8:1a) which would be accounted for through their allocation for ‘mixed use’ overall.

## Monitoring

6.291a Output monitoring will make use of London Development Database and in-house activity monitoring, whilst outcome monitoring will rely on corporate surveys. Outcomes concerning infrastructure sufficiency in terms of distributional and other ‘fitness’ criteria are also the target of ongoing evidence base and audit work, along with headline ‘satisfaction with the area’ data. Decisions and appeals monitoring also supports assessment of policy relevance and effectiveness.

### 6.291b Indicators

- i. INF-OP-11 Policy Use and Robustness [No specific target, should be using regularly if effective, and supported at appeal];
- ii. INF-OP-13 Ensuring community facilities keep pace with need:
  - a. Net new community infrastructure floorspace in new and established neighbourhoods [monitor changes of provision against identified needs];
  - b. IDP project and planning milestones [monitor progress of projects and planning for community facilities against benchmarks set out in the IDP];

- iii. INF-OUT-7 Residents satisfaction with community facilities (health, education, leisure) [no specific target: should be stable or improving].

# INF9 Infrastructure Delivery

Proposals that address the following strategic principles and spatial strategy, and technical criteria will be supported:

## 1. Strategic Principles and Spatial Strategy:

- a. All development will be required to demonstrate infrastructure sufficiency accounting for existing deficits as well as new needs arising, with new infrastructure delivered alongside housing and other growth;
- b. Identified infrastructure needs and planning requirements needed to accommodate planned growth (other than those relating to access to jobs and access to conventional housing) are set out in the Infrastructure Delivery Plan and where appropriate, Site allocations and spatial policies;
- c. Where infrastructure needs, including housing mix, employability interventions and the type of infrastructure solution to an issue arising are subject to viability, the following priorities accord with the plan's objectives:
  - i. Family and affordable housing to help create stable, mixed and balanced communities;
  - ii. Local access to employment and training to help secure convergence and resilience; and
  - iii. Infrastructure that secures good growth and optimises development potential, balancing local and strategic needs.

## 2. Technical Criteria:

- a. In demonstrating infrastructure sufficiency, an assessment should be undertaken accounting for:
  - i. The needs, commitments and planning requirements set out in the IDP and relevant thematic policies and site allocation specifications that reflect this;
  - ii. Recent technical studies and engagement with strategic infrastructure commissioners and providers that may update the position set out in the latest IDP;
  - iii. Accessibility, capacity and availability of existing infrastructure in the area where this is to be relied upon;
  - iv. Potential CIL contributions relative to the infrastructure funding gap, and mindful of the spending limitations set out in the Reg 123 list; and

- v. The ability of the development proposal to make physical and financial contributions to meet needs arising where consistent with other policies and latest CIL regulations.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles and Spatial Strategy.

## Justification

- 6.293 Local authorities have a requirement to invest in their communities and to develop the necessary infrastructure (physical, social and green, including affordable and specialist housing and mechanisms to connect people to job and business opportunities) to support them, however this is not a responsibility that falls to the local authority in isolation. The development of localities requires investment from a range of sources including healthcare providers, water and sewerage undertakers, ~~and~~ national agencies, and developers. Where there is a substantial programme of development or regeneration, such as in Newham, there is a need for the investment strategies of the various agencies to be effectively coordinated through integrated infrastructure planning, and for growth, notably of housing, but also of employment space, to occur alongside the evolution of infrastructure. The ultimate objective is to ensure 'good growth' is achieved, maintaining and preferably enhancing quality of life, rather than resulting in unacceptable impacts and externalities.
- 6.295 It is important for the Council and other infrastructure providers to have a firm grasp of the infrastructure needs of the future, and how they relate to existing plans of service providers to improve service delivery. The planning process provides a forum in which to align providers' plans with the expected population and household growth; because it is important to identify any remaining funding gaps for infrastructure provision after these plans have been assessed; and because there needs to be a sound basis for infrastructure specified in site allocations and for the collection of developer contributions.
- 6.296 The NPPF confirms that the Local Planning Authority should engage with authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands. The outcome of such engagement, set out within the Infrastructure Delivery Plan (IDP) and reflected in the spatial and thematic policies demonstrates how the infrastructure needs arising from the strategy set out in the development plan will be met, including provision for managing 'known unknowns' which are the inevitable consequence of varying planning horizons and processes. As such the IDP has been embedded within policy to signpost to infrastructure providers, land owners and developers the full costs of delivering schemes in the borough and the associated impact on demand/need for infrastructure and services.
- 6.297 Some [infrastructure] policy requirements are subject to viability, and the variety of cost demands on a development means it is helpful to specify which of these are most important in light of the overall vision and objectives of the Plan. In doing so it is

acknowledged that shortfalls will have to be picked up by other agencies/mechanisms e.g. direct grant funding of affordable housing.

## Implementation

- 6.298 Infrastructure sufficiency is defined as having enough infrastructure capacity in the right places at the right time to meet needs arising (existing and future needs) in ways that meet reasonable expectations. Such reasonable expectations relate to planning benchmarks and those achieved Pan-London and more locally, as well as those set out elsewhere in the Plan, (including accessibility benchmarks described in INF2 & INF5) the IDP and technical studies, and impact modelling on quality of life, business continuity, blight/opportunity cost and the environment. Capacity may be new or existing, particularly through enhancements to existing, and assessments will need to be mindful of existing deficits, accessibility constraints (physical, financial, temporal, inclusivity) and the role of identified sites in addressing deficits in light of the overall scarcity of sites, particularly for open space and community facilities such as schools and healthcare.
- 6.298ai Demonstrating infrastructure sufficiency will therefore include an assessment of [gross and net] infrastructure needs arising, and how these will be met on or off site, whether through physical (e.g. provision of floorspace, floorspace flexibility or access improvements) or financial contributions (e.g. Mayor of London and Newham CIL, S106) or other undertakings (e.g. relating to public access or user charges) necessary to make an application acceptable in planning terms. As part of this, particularly where the IDP indicates evolving plans, engagement will need to occur with key providers/undertakers/commissioners, such as Thames Water, the Newham CCG and the Council. The Council offers a range of pre-application services in order to help applicants develop their proposal in accordance with planning policy. Early engagement with the Council, infrastructure providers and commissioners and other statutory consultees plays an important part in achieving successful planning outcomes, particularly for large scale and complex cases where infrastructure planning is likely to be an iterative process in tandem with capacity testing.
- 6.298aii For small sites and windfall sites infrastructure needs are likely to be less substantial and the infrastructure assessment should be proportionate to the scale of the development. However cumulative impact may still be an issue and the availability of services and facilities in accessible locations will be particularly relevant to an application. Proposals should set out specific consideration on this point, including any specialist needs. Again early engagement with the Council is recommended in order to establish likely issues and areas of focus.
- 6.298a Development proposals, particularly on Strategic Sites, need to ensure that their infrastructure requirements do not place an unacceptable impact onto existing communities or infrastructure, in turn fettering future development i.e. through under provision of community facilities, excessive demand on utilities, insufficient public transport capacity to cope with additional demand etc. This will be particularly relevant where the development proposed is not accounted for in funded infrastructure plans

including where the proposal places different infrastructure demands than envisioned in the development plan or most recent IDP.

- 6.298aiii In anticipating what degree of capacity shortfall would be met by CIL expenditure, applicants should be mindful of the Regulation 123 list which delimits what CIL may be spent on locally, and the scale of the funding gap outlined in the CIL charging schedule evidence base or such other updated evidence, relative to likely CIL receipts given CIL levels and coverage (i.e. exclusion of certain forms of development). The annual CIL receipts and expenditure are reported in the Community Infrastructure Levy (CIL) Report and published in accordance with the CIL Regulations. Broadly, mitigation of impacts of a development should not be expected to be [wholly] provided by CIL; to ensure development is acceptable account must be taken of the full impact of the proposal on existing communities and infrastructure.
- 6.298aiv Where appropriate, financial and non-financial planning obligations will be sought to secure the provision, operation of, and maintenance/ management of site specific infrastructure and the mitigation of any environmental impacts arising from development necessary to make the development acceptable in planning terms.
- 6.298b The IDP is intended to inform the plans of both developers and providers, whilst providing comfort for existing residents and businesses that growth can be appropriately accommodated within planned infrastructure provision/infrastructure planning processes. It will be periodically updated, ideally annually, to clarify what has been delivered and any change in the need/demand for infrastructure as per updated information from providers and technical studies, which should be factored into masterplanning, impact/sufficiency testing and providers' strategic planning. Infrastructure projects identified within the IDP are regarded as having demonstrated need and a strategic approach to infrastructure where this is a policy requirement, notably INF8.
- 6.298c Where engagement with infrastructure providers and commissioners to update the IDP proves challenging despite Duty to Co-operate obligations, efforts will be made to escalate the issue, notably through work with neighbouring authorities and the GLA. Such difficulties will also be noted in the IDP itself, identifying its information may be incomplete.
- 6.298c A Planning Obligations Supplementary Planning Document will be produced to clarify, in line with the Regulation 123 list, what the expectations are of in-kind or financial contributions towards physical and social infrastructure. The priority list in 1c is to guide the application of review mechanisms and negotiations; the weight given to each priority category will vary on a site by site basis according to particular strategic and local needs which are reflected in specific site allocations and designations and associated policies. Infrastructure to deliver good growth is that that falls within the remit of the IDP.

## Monitoring

- 6.299 Delivery of infrastructure will be kept under review, monitored against the indicators set out below and through ongoing engagement with commissioners and providers published in the LBN Authority Monitoring Report, annual S106 and CIL reports and associated monitoring bulletins and in updates to the IDP. Going forward, updates to the IDP will be



used to update the spatial strategy where these updates are aligned with Plan Review. Outcomes are not specific to the policy; rather, reference should be made to those identified under S1 relating to the overall spatial vision of which this policy is an important part.

#### 6.299a Indicators

- i. INF-OP-15 Securing Appropriate Infrastructure Delivery Mechanisms:
  - a. Developer contributions for community infrastructure and open space improvements (including physical and financial contributions) [no specific target, should be relevant to the IDP and spatial strategy];
  - b. CIL Charging Schedule and Receipts / Spend [no target, reference to the infrastructure funding gap will be made];
  - c. Overall IDP progress and other infrastructure delivery mechanisms [targets are the milestones set out in the IDP];
- ii. INF-OP-11 Policy Use and Robustness [No specific target, should be using regularly if effective, and supported at appeal].

# Appendix 1 - Strategic Site Allocations

## Stratford and West Ham

S05 – Stratford Central	255
S10 – Abbey Mills	256
S29 – Plaistow North	257

## Royal Docks

S21 – Silvertown Quays	258
<b>S22 – Minoco Wharf</b>	259
S09 – Silvertown Landing	260
S07 – Central Thameside West	262
S20 – Lyle Park West	263
S23 – Connaught Riverside	264
S04 – North Woolwich Gateway	265

## Custom House and Canning Town

S08 – Thames Wharf	266
S11 – Parcelforce	267
S13 – Manor Road	268
S14 – Canning Town Central	269
S15 – Canning Town East	270
S16 – Silvertown Way East	271
S17 – Silvertown Way West	272
S18 – Limmo	273
S28 – Custom House/Freemasons	274
S30 – Royal Victoria West	275
S12 – Canning Town Riverside	276
S06 – Coolfin North	277

## Beckton

S19 – Albert Basin	278
S31 – Royal Albert North	279
S01 – Beckton Riverside	280
S02 – Alpine Way	282

## Urban Newham - Forest Gate

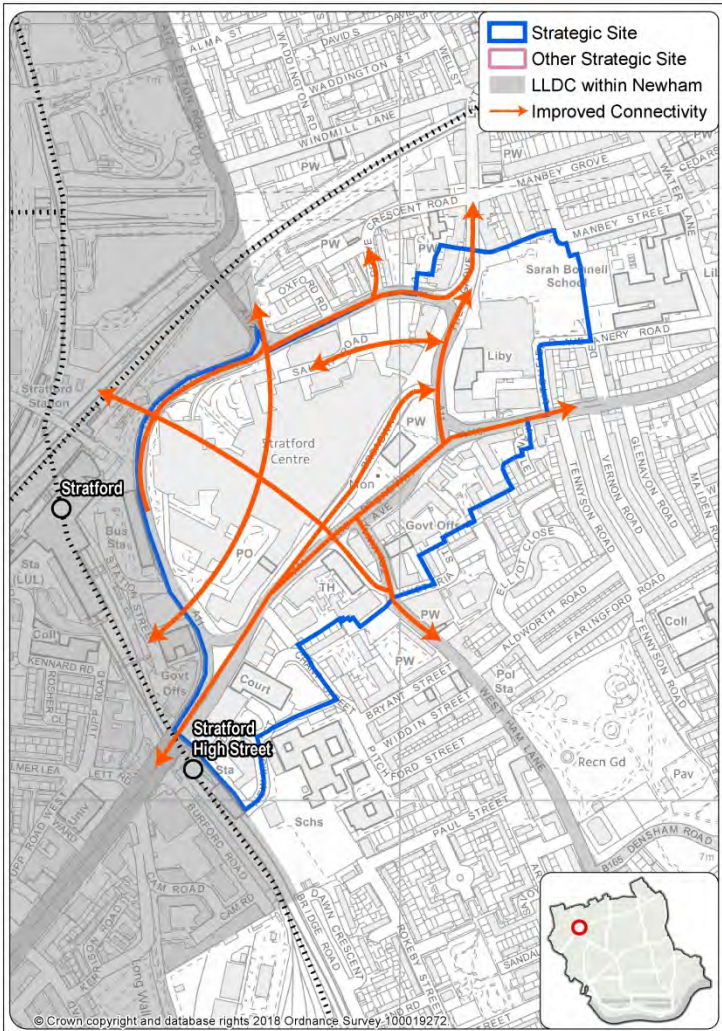
S24 – Woodgrange Road West	283
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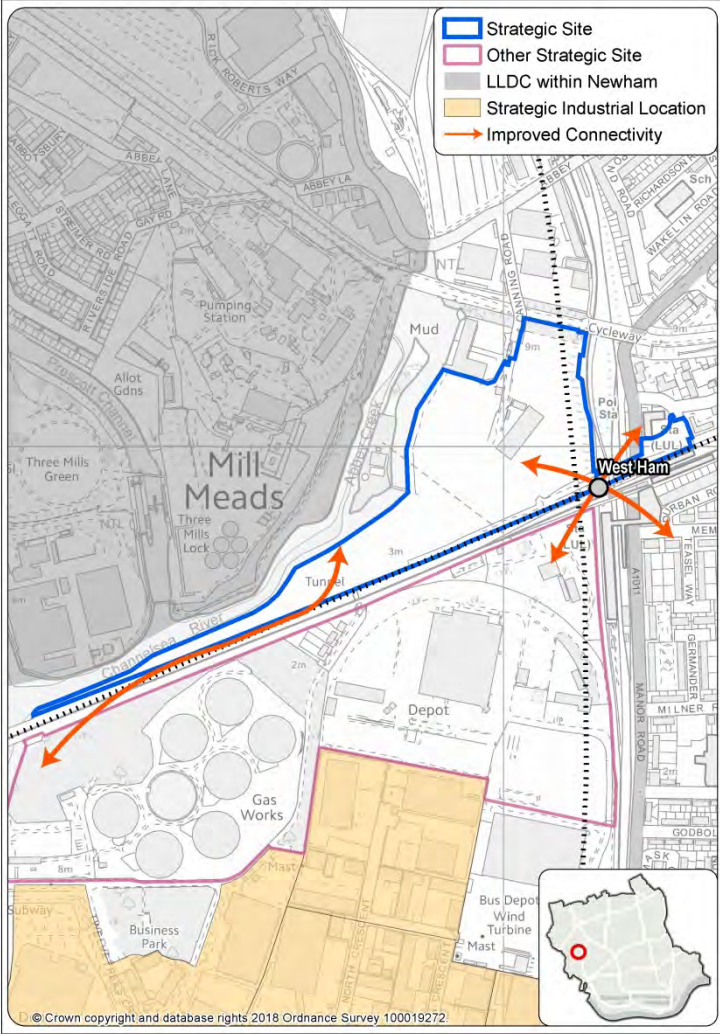
## Urban Newham - East Ham

S25 – East Ham Market	284
S26 – East Ham Town Hall Campus	285
S03 – East Ham Western Gateway	286

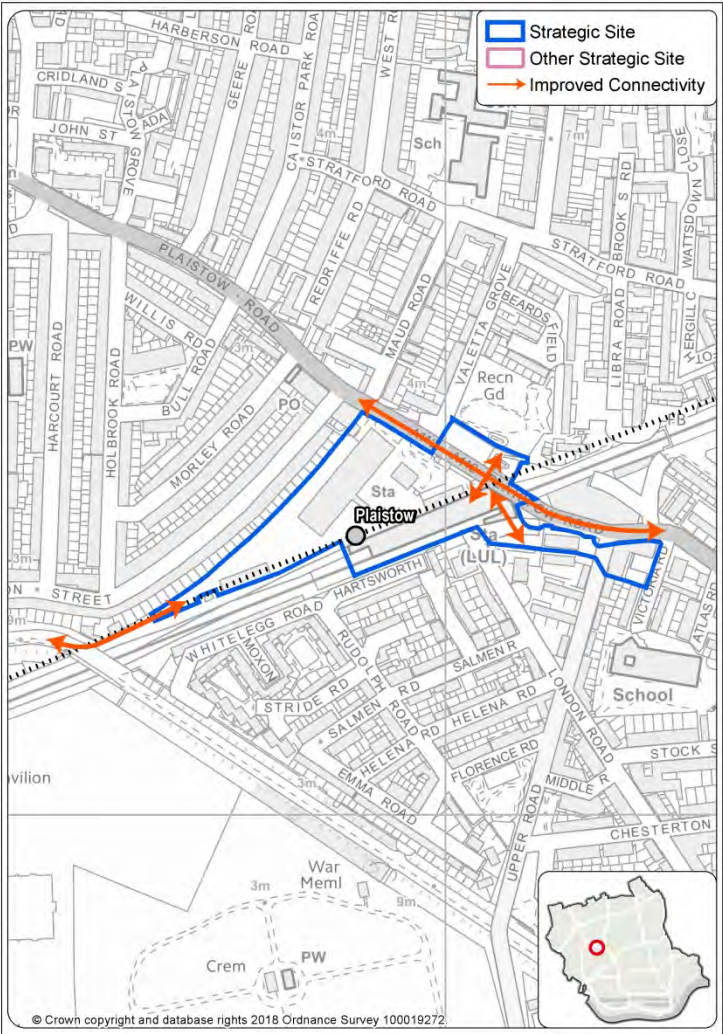
## Urban Newham - Green Street

S27 – Queen’s Market	287
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Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Stratford Central	S05	Stratford & West Ham	<p><b>Renewal and reconfiguration of the existing retail offer, with scope for expansion of mainly comparison floorspace (in accordance with the requirements of Policy INF5) together with other town centre and residential uses and environmental quality, character and permeability improvements. Integration with Stratford City and the surrounding Olympic Legacy sites is key, ensuring that a complementary offer is maintained and investment opportunities are maximised, with parity of design quality and continuity of public realm. Indicative building heights of 20 plus storeys: stepping down to low (4-5 storey) and mid rise (6 to 8) at the site margins, with particular sensitivity to the St Johns and University Conservation areas and Listed Buildings along the High Street/Broadway.</b></p> <p><b>See also Policies S1, S2, SP4, SP5, SP6, SP7, SP9, J1, H3, INF1, INF2, INF4, INF5 and INF9.</b></p>	<ul style="list-style-type: none"><li>Stratford St John's Conservation Area Appraisal and Management Plan</li><li>SFRA 2017</li><li>Town Centre Study 2016</li><li>HRA screening report (2018);</li></ul>
<b>Map</b>				<b>Constraints and Other Advisory Information</b> <ul style="list-style-type: none"><li>PTAL (2021): 6b</li><li>Partially built out, some extant planning permissions</li><li>Conservation Area (partial)</li><li>Listed buildings</li><li>APA Tier 2</li><li>Metropolitan town centre – in centre location</li><li>Employment Hub E5: Stratford Metropolitan</li><li>Tallest Buildings Area</li><li>Flood zone 2/3 (partial)</li><li>Licensing Saturation Zone</li><li>Betting Shops and Hot Food Takeaways hotspot</li><li>Parks deficiency</li><li>AQMA</li><li>Airport Safeguarding: consult LCA for all works over 45m &amp; 90m in height</li><li>Water mains on/adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from surrounding natural watercourse;</li><li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li></ul>
			<b>Partners</b> <p>LBN / Private Developer(s)</p>	<b>Phasing</b> <p>Short/medium/long term</p>

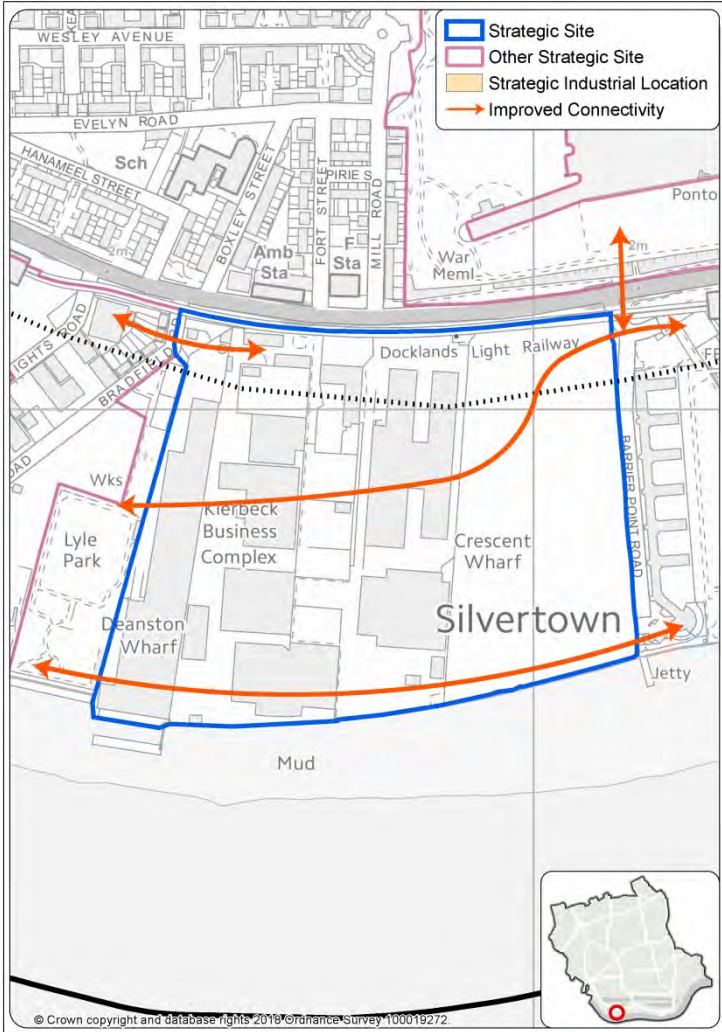
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Abbey Mills	S10	Stratford & West Ham	<p>The site will be developed for a mix of residential and employment-generating uses and contribute to the creation of a new local centre in the station vicinity. This mix may include an element of community uses (including faith based) of a scale which is proportionate and which does not dominate the overall mix of uses in respect of land take, scale and traffic generation, located either within the local centre or so as to be well connected with the local centre and the station. Site access improvements will be required including a link to West Ham Station and facilitation of a possible future link to S11 Parcellforce. Indicative building heights of 8-12 storeys with lower development to west to maximise views of riverside and nearby heritage assets.</p> <p>See also Policies S1, S2, SP4, SP5, SP7, SP9, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"><li>SFRA 2017</li><li>HRA screening report (2018);</li></ul>
Map				Constraints and Other Advisory Information
				<ul style="list-style-type: none"><li>PTAL (2021): 6b - 4</li><li>SINC (partial)</li><li>Significant contamination (prior industrial chemical use).</li><li>Listed Buildings and Conservation Area (adjacent)</li><li>APA Tier 3</li><li>Flood zone 3/2 (partial)</li><li>Critical drainage area (adjacent)</li><li>AQMA (adjacent)</li><li>Hot Food Takeaways hotspot</li><li>SINC (adjacent and partial)</li><li>Thames Tideway Tunnel Safeguarding (partial)</li><li>Airport Safeguarding consult LCA for all works over 15m &amp; 45m in height</li><li>Major Hazards Site (former Bromley-by-Bow Gasholders) middle/outer zone</li><li>Water mains on/adjacent site (Piling Method Statement and consultation with Thames Water required);</li><li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li></ul>
			Partners	Phasing
			Private Developer(s)	Medium to long term



Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Plaistow North	S29	Stratford & West Ham / Plaistow	<p>Mixed use development including residential and a new clearly defined local centre incorporating retail and community use frontage to both sides of Plaistow Road and step-free access to Plaistow station. On the triangle site to the west of Plaistow Road, a mix of residential accommodation, open space with connections to the Greenway, and business space. Indicative building heights of 6-8 storeys, and up to 20 storeys immediately adjacent the station.</p> <p>See also Policies S1, S2, S6, SP4, SP5, SP6, SP7, SP9, H3, INF1, INF2, INF4, INF5, INF6, INF7 and INF9.</p>	<ul style="list-style-type: none"> <li>SFRA 2017</li> <li>Town Centre Study 2016</li> <li>HRA screening report (2018);</li> </ul>
Map				Constraints and Other Advisory Information
				<ul style="list-style-type: none"> <li>PTAL (2021): 6a – 4</li> <li>Extant planning permission (partial)</li> <li>Listed Buildings and Conservation Area (adjacent)</li> <li>Flood zone 3/2 (partial)</li> <li>Critical drainage area (adjacent)</li> <li>Licensing Saturation Zone</li> <li>Betting Shops and Hot Food Takeaways hotspot</li> <li>AQMA</li> <li>Parks deficiency</li> <li>Traffic Congestion Zone</li> <li>SINC (adjacent)</li> <li>Airport Safeguarding: consult LCA for all works over 45m in height</li> <li>Existing heat network in Stratford (within 1km), see policy INF4</li> <li>Water mains on/adjacent site (Piling Method Statement and consultation with Thames Water required);</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>
			Partners	Phasing
			Private Developer(s)/LBN	Short to medium term

Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Silvertown Quays	S21	Royal Docks	<p>Residential-led mixed use with potential for leisure and hospitality and green industries including research and development, building on the visitor attraction cluster at the western end of the docks (ExCeL, Siemens building). New residential development on this site will form part of the wider neighbourhood at Silvertown, supported by local shopping and community uses (a new local centre) focused around North Woolwich Road, including activation of and connectivity through space under the DLR viaduct. Leisure uses should relate to the water space, with clear pedestrian and cycle connections through to the new local centre and across the dock to the ExCeL centre, and across North Woolwich Road. Public access to the dock edge should be provided. Indicative building heights of 6 to 8 storeys, up to 16 storeys at key locations.</p> <p>See also Policies S1, S3, SP4, SP5, SP6, SP7, SP9, J2, H3, INF1, INF2, INF3, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"><li>SFRA 2017</li><li>Town Centre Study 2016</li></ul>
Map				Constraints and Other Advisory Information
<p>© Crown copyright and database rights 2018 Ordnance Survey 100019272.</p>				<ul style="list-style-type: none"><li>PTAL (2021): 2 – 3</li><li>Extant planning permission.</li><li>Listed Buildings</li><li>APA Tier 3</li><li>Flood zone 3/2</li><li>Park deficiency</li><li>Licensing Saturation Zone</li><li>AQMA</li><li>Airport Safeguarding: consult LCA for all works</li><li>Airport noise insulation (see Policy INF2)</li><li>Water mains on/adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from surrounding natural watercourse;</li><li>Within Royal Docks Enterprise Zone</li></ul>
			Partners	Phasing
			GLA / Private Developer(s)	Medium to long term



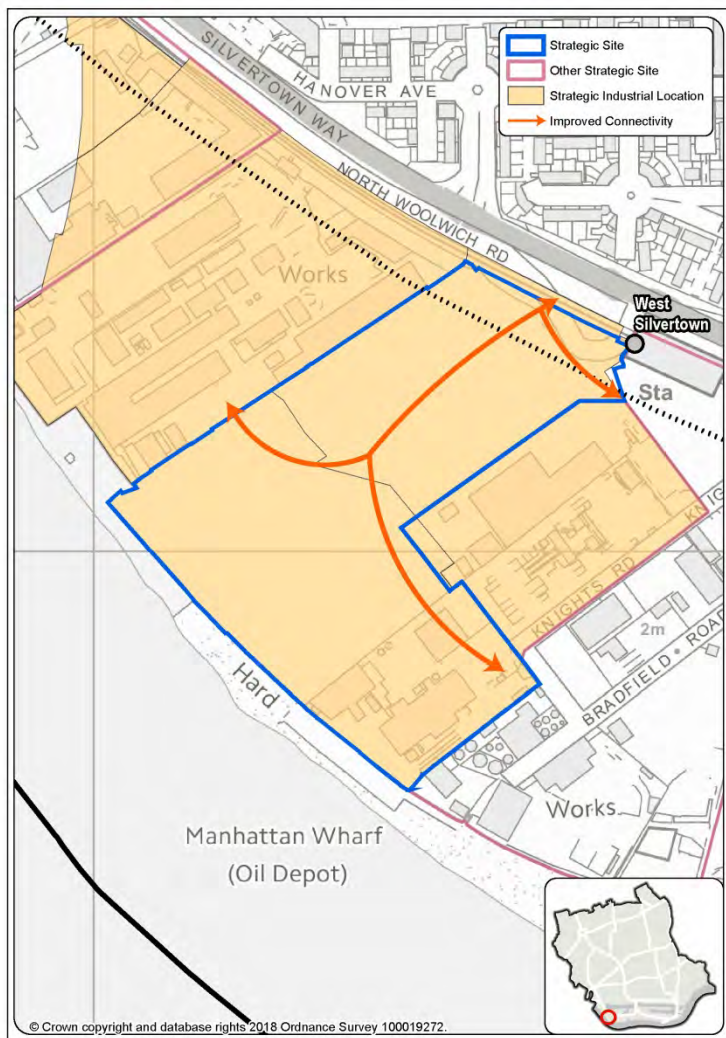
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Minoco Wharf	S22	Royal Docks	<p>The Managed Release of land designated as a Strategic Industrial Location at Thameside West up to the eastern boundary of Lyle Park, will assist in the development of a new neighbourhood at West Silvertown. A new local centre should address North Woolwich Road providing a focus to the new neighbourhood as a whole and provide connections to both DLR stations, and pedestrian and cycle links to Silvertown Quays. Development should include pedestrian and cycle access to the river. Indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations.</p> <p>See also Policies S1, S3, SP4, SP6, SP7, SP9, J2, H3, INF1, INF2, INF4, INF5, INF6, INF7 and INF9.</p>	<ul style="list-style-type: none"><li>SFRA 2017</li><li>Town Centre Study 2016</li></ul>
Map				Constraints and Other Advisory Information
				<ul style="list-style-type: none"><li>PTAL (2021): 2</li><li>Extant planning permissions/under construction</li><li>Grade II listed Silvertown War Memorial</li><li>Flood zone 3/2</li><li>AQMA</li><li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li><li>APA Tier 3</li><li>Parks deficiency</li><li>Airport Safeguarding: consult LCA for all works</li><li>Airport noise insulation (see Policy INF2)</li><li>Water mains on site (Piling Method Statement and consultation with Thames Water required);</li></ul>
			Partners	Phasing
			Private Developer(s)	Short term



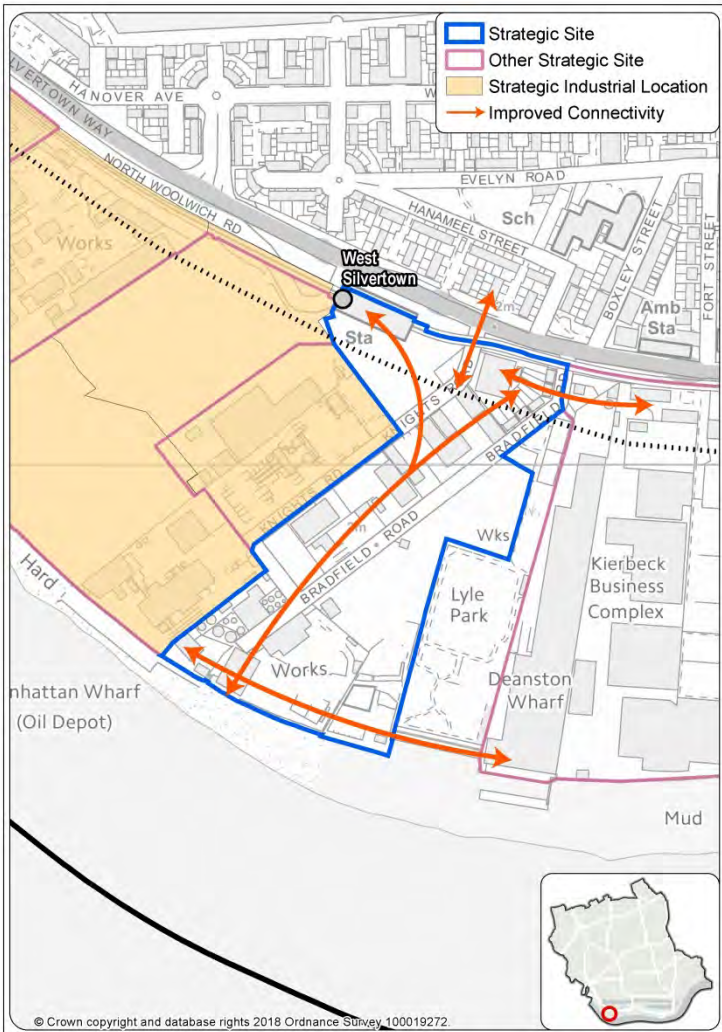
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Silvertown Landing	S09	Royal Docks	<p>Mixed use consolidating the community centred on the new DLR station at Thames Wharf on the western part of the site through Managed Release of SIL, and employment/strategic infrastructure development at the east of the site, where the functionality and capacity of the SIL will be protected securing buffering of both new and existing SIL and strategic infrastructure with possible scope for further limited release via Managed Intensification as per J2. Employment uses on the SIL should include modern industrial and warehousing, but may also link to the adjacent LMUA, with the scope to secure Managed Intensification (as per J2) and further release if new formats are realised, reducing the spatial footprint whilst achieving the same capacity, functionality and ability to respond to industrial and warehousing demand. The Managed Release of the western part of the site for mixed use will secure an appropriate transition from SIL and strategic infrastructure and include residential uses, green and community infrastructure meeting local need, and employment generating uses. Convenient and comfortable connections to the DLR stations at West Silvertown, Thames Wharf and Royal Victoria, and along and across North Woolwich Road will be improved as will pedestrian and cycle links through to and along the river (where public space will open out) and docks and to nearby local centres and Canning Town town centre. Indicative building heights of 10 to 12 storeys with buildings of up to 18 storeys being acceptable at key locations.</p>	<ul style="list-style-type: none"><li>Silvertown Tunnel DCO</li><li>SFRA 2017</li><li>HRA screening report (2018);</li></ul>
Map				Constraints and Other Advisory Information
<p>© Crown copyright and database rights 2018 Ordnance Survey 100019272.</p>			<ul style="list-style-type: none"><li>PTAL (2021): 3 - 2</li><li>SIL (partial)</li><li>Employment Hub E2: Thameside West</li><li>Silvertown Tunnel safeguarding</li><li>Protected Mooring Point</li><li>Cable Car Protection Zone</li><li>APA Tier 3</li><li>Contamination</li><li>Flood zone 3/2</li><li>AQMA</li><li>Parks deficiency</li><li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li><li>Airport Safeguarding: consult LCA for all works</li><li>Airport noise insulation (see Policy INF2)</li><li>Water mains on/adjacent (Piling Method Statement and consultation with Thames Water required);</li><li>PLA to be consulted early on in development of any new river crossing options</li></ul>	

	See also Policies S1, S3, SP4, SP7, SP8, SP9, J1, J2, H3, INF1, INF2, INF4, INF6, INF7, INF8 and INF9.	<ul style="list-style-type: none"> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>
	<b>Partners</b>	<b>Phasing</b>
	GLA / Private Developer(s)	(Medium to) Long term

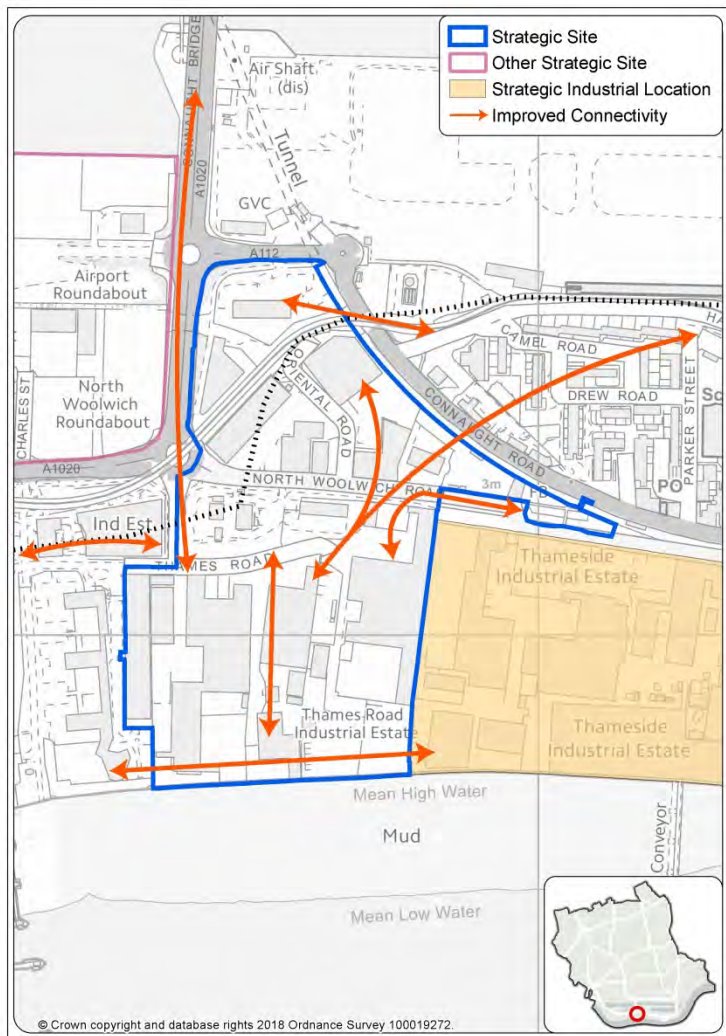
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Central Thameside West	S07	Royal Docks	<p>Employment and wharf development comprising the reactivated Peruvian Wharf and consolidation of other Thameside West Wharves on this and land to the east at Royal Primrose Wharf. Employment development will be consistent with the Strategic Industrial Location (SIL) designation, maximising opportunities for modern industrial uses and support the wharf use including providing access, together with improved access to adjoining SIL uses from North Woolwich Road, preferably in the form of a central spine road with connections east, west and to the wharves.</p> <p>See also Policies S1, S3, SP7, SP9, J1, J2, INF4 INF6 and INF9.</p>	<ul style="list-style-type: none"> <li>ELR 2017</li> <li>SFRA 2017</li> <li>HRA screening report (2018);</li> </ul>
Map				<b>Constraints and Other Advisory Information</b> <ul style="list-style-type: none"> <li>PTAL (2021): 3 - 2</li> <li>Some extant planning permissions</li> <li>SIL</li> <li>Employment Hub E2: Thameside West</li> <li>Safeguarded Wharves/ consolidation area</li> <li>Flood Defence Safeguarding</li> <li>APA Tier 3</li> <li>Flood zone 3/2</li> <li>AQMA</li> <li>SINC (adjacent)</li> <li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li> <li>Airport Safeguarding: consult LCA for all works &amp; works over 15m in height (see mapping)</li> <li>Sewers on site (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from Thames River;</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>
			<b>Partners</b>	<b>Phasing</b>
			PLA / GLA / Private Developer(s)	Short to medium term





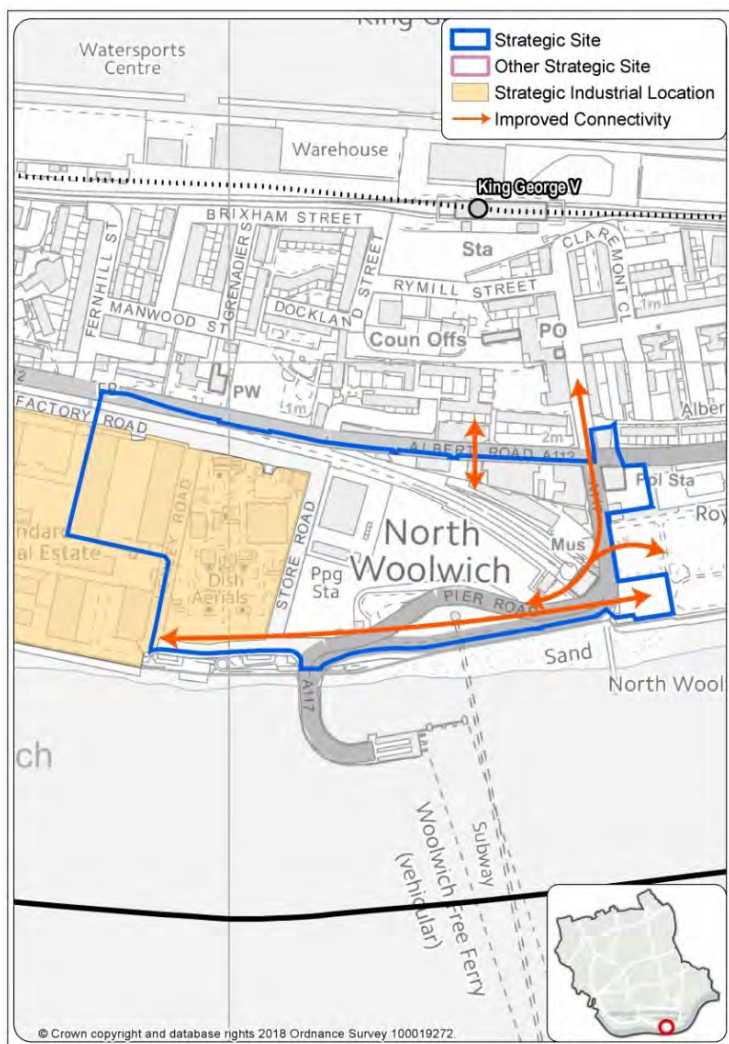
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Lyle Park West	S20	Royal Docks	<p>Mixed use redevelopment through the Managed Release of land designated as a Strategic Industrial Location and consolidation of wharves on the adjacent site (which will allow for subsequent removal of their safeguarding) will assist in the consolidation of a new neighbourhood at West Silvertown, with an additional small scale local centre around the station complementing that at Minoco Wharf (Royal Wharf). The neighbouring industrial uses will be buffered by design responses at the western side of the site, whilst at the eastern side, Lyle Park will be enhanced and activated through integration with the new development. Connections to the DLR stations at Pontoon Dock and West Silvertown will be secured as will pedestrian and cycle links to Silvertown Quays and through to the river. Indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations including West Silvertown DLR station.</p> <p>See also Policies S1, S3, SP4, SP6, SP7, SP8, SP9, J1, J2, H3, INF1, INF2, INF4, INF5, INF6, INF7 and INF9.</p>	<ul style="list-style-type: none"><li>SFRA 2017</li></ul>
Map				Constraints and Other Advisory Information
 <p>© Crown copyright and database rights 2018 Ordnance Survey 100019272</p>				<ul style="list-style-type: none"><li>PTAL (2021): 2</li><li>Protected public access to the river point</li><li>APA Tier 3</li><li>Contamination</li><li>Flood zone 3/2</li><li>AQMA</li><li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li><li>Protected public access to the river point (INF1)</li><li>Parks deficiency</li><li>Airport Safeguarding: consult LCA for all works &amp; works over 15m in height (see mapping)</li><li>Airport noise insulation (see Policy INF2)</li><li>Water mains and sewers on site (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from Thames River;</li></ul>
			Partners	Phasing
			Private Developer(s)	Short to medium term

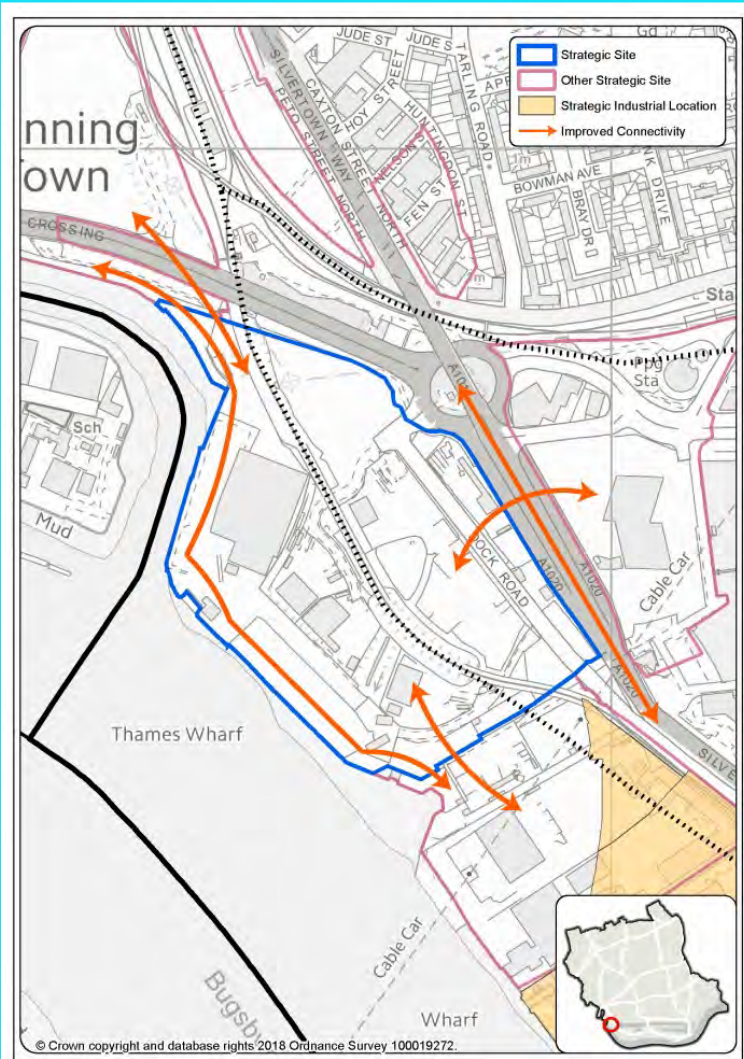
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Connaught Riverside	S23	Royal Docks	<p>Mixed use, consolidating the new neighbourhoods at Pontoon Dock and Silvertown Quays and securing an effective transition to the SIL to the east, and airport and existing residential uses to the north east. On the northern section of the site, industrial and warehousing will be consolidated in the LIL, with surrounding plots affording the opportunity to integrate with this and surrounding residential and to introduce and enhance the visitor economy and cultural industry and effect place-making focused on the character and heritage asset of St Marks Church/Brick Lane Music Hall. Residential development and new community infrastructure including a school will be focused at the southern section of the site through Managed Release of SIL, with employment uses with separate access, including modern industrial/warehousing and workshops, buffering neighbouring SIL. Connectivity through the site and beyond is a key priority, particularly pedestrian and cycling routes to DLR stations at Pontoon Dock, Prince Regent and London City Airport across the railway, and through to the river and docks, where access will be opened out. Indicative building heights of 6 to 8 storeys including in the vicinity of the listed St Marks Church, and up to 15 storeys at key locations.</p> <p>See also Policies S1, S3, SP4, SP5, SP6, SP7, SP8, SP9, J1, J2, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>SFRA 2017</li> </ul>
Map				<b>Constraints and Other Advisory Information</b> <ul style="list-style-type: none"> <li>PTAL (2021): 2 - 1b</li> <li>LIL (partial)</li> <li>SIL (partial)</li> <li>Operational wharf adjacent (Tate &amp; Lyle Refinery) [INF1]</li> <li>Employment Hub E3: Thameside East</li> <li>Listed building</li> <li>APA Tier 3</li> <li>Contamination</li> <li>Flood zone 3/2</li> <li>Critical Drainage Area (partial)</li> <li>AQMA</li> <li>Hot Food Takeaways hotspot</li> <li>Parks deficiency</li> <li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li> <li>Airport Safeguarding: consult LCA for all works</li> <li>Airport noise insulation (see Policy INF2)</li> <li>Water mains on/adjacent site (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from Thames River;</li> </ul>
			<b>Partners</b>	<b>Phasing</b>
			Private Developer(s)	Medium to long term





Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
North Woolwich Gateway	S04	Royal Docks	<p>Employment-led mixed use redevelopment reflecting the gateway location and activating and enhancing heritage and character assets including the station, foot tunnel portal, river and Royal Victoria Gardens. New SIL uses will be focussed on the west of the site, and cultural, community and creative uses focused around North Woolwich Station, complementing the local centre and securing integration with the wider neighbourhood. Residential uses will be suitable for careful deployment where compatible with these uses and the operation of the ferry; longer term should the ferry crossing cease, more residential opportunities may arise. Quality pedestrian and cycle connections to King George V DLR station and North Woolwich local centre will be crucial, together with improvements to Albert Road, as will improved links to and along the river, opening up riverside spaces for public use. Indicative building heights of 6 to 8 storeys with buildings of up to 15 storeys at key locations.</p> <p>See also Policies S1, S3, SP4, SP6, SP7, SP8, SP9, J1, J2, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>SFRA 2017</li> <li>HRA screening report (2018);</li> </ul>
Map				<b>Constraints and Other Advisory Information</b> <ul style="list-style-type: none"> <li>PTAL (2021): 3 - 2</li> <li>SIL (partial)</li> <li>Employment Hub E3: Thameside East</li> <li>Protected Mooring Point</li> <li>APA Tier 3</li> <li>Contamination</li> <li>Flood zone 3/2</li> <li>Listed buildings</li> <li>AQMA</li> <li>Hot Food Takeaways hotspot</li> <li>Parks deficiency</li> <li>Traffic congestion zone</li> <li>Flood defence safeguarding</li> <li>Crossrail Safeguarding</li> <li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li> <li>Protected public access to the river point (INF1)</li> <li>Airport Safeguarding: consult LCA for all works</li> <li>Water mains on site (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from Thames River;</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>
			<b>Partners</b>	<b>Phasing</b>
			GLA / Private Developer(s)	Short/medium/long term



Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Thames Wharf	S08	Canning Town & Custom House	<p>There is scope to consolidate the safeguarded wharf at Central Thameside West (Royal Primrose Wharf) and subsequently to remove the wharf safeguarding at Thames Wharf subject to there being no net loss of functionality or wharf capacity. This and Managed Release from SIL (see Policy J2) will provide the opportunity to develop a new neighbourhood, comprising new residential and community uses including a school, and employment, leisure/ tourism grouped around a new DLR station and Local Centre, well connected by pedestrian and cycle links. Continuous riverside access; links to the Lea River Park and across to Trinity Buoy Wharf, to Royal Victoria and West Silvertown DLR stations and Canning Town town centre; North Woolwich Road active street improvements; and appropriate connectivity and integration with adjacent Silvertown Landing strategic site will be secured. Indicative building heights Of 10 to 12 storeys with buildings of up to 18 storeys at key locations.</p> <p>See also Policies S1, S3, S4, SP4, SP6, SP7, SP9, J2, H3, INF1, INF2, INF3, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"><li>SFRA 2017</li></ul>
Map				<b>Constraints and Other Advisory Information</b> <ul style="list-style-type: none"><li>PTAL (2021): 3 - 1a</li><li>APA Tier 3</li><li>Flood zone 3/2</li><li>Crossrail Safeguarding</li><li>Silvertown Tunnel Safeguarding</li><li>Licensed waste facilities on site [INF3]</li><li>DLR service access road</li><li>Pylon</li><li>AQMA</li><li>Parks deficiency</li><li>DLR station (passive safeguarding)</li><li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li><li>Airport Safeguarding: consult LCA for all works over 15m in height (see mapping)</li><li>Airport noise insulation (see Policy INF2)</li><li>Water mains adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from Thames River;</li><li>PLA to be consulted early on in development of any new river crossing options</li></ul>
				
			<b>Partners</b>	<b>Phasing</b>
			GLA / PLA / Private Developer(s)	Medium to long term

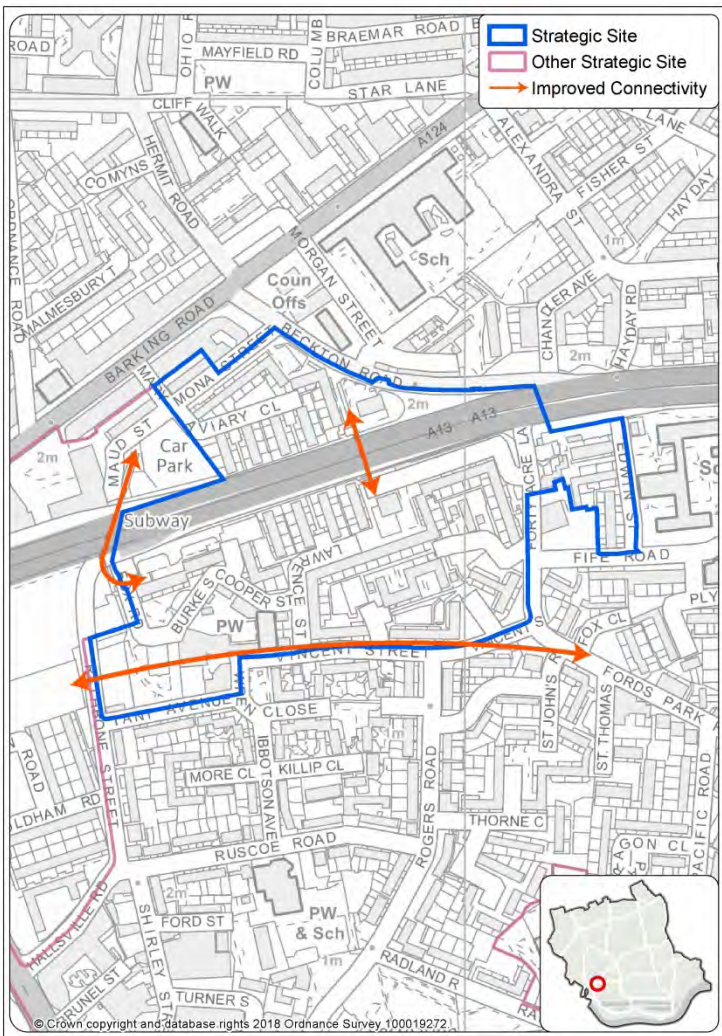


Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Information
Parcelforce	S11	Canning Town & Custom House	<p>Employment-led mixed use (linking to existing Cody Road industrial uses) area that contributes to the creation of a new neighbourhood and of a new local centre in the vicinity of West Ham station, along with delivery of a riverside open space. Proposals will require an assessment of and an appropriate viable strategy for the Grade II listed gasholders. This should take into account the impacts on the significance of the gasholders, including any effects on setting, recognise their role as heritage and character assets and their potential contribution to place making. Site access improvements will be required, including a-links to West Ham station, the neighbourhood beyond, to S10 and to Bromley-by-Bow. Indicative building heights of 8-12 storeys with lower development towards the west of the site sensitive to the heritage assets, and up to 19 storeys around the station, subject to addressing the sensitivity of existing homes on Manor Road.</p> <p>See also Policies S1, S4, SP4, SP5, SP6, SP7, SP8, SP9, J1, J2, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>Town Centre Study 2016</li> <li>HRA screening report (2018);</li> </ul>
Map				Constraints and Other Advisory Information
				<ul style="list-style-type: none"> <li>PTAL (2021): 6b – 3</li> <li>Listed gasholders</li> <li>TPO 1101/1 Tree Preservation Order covers mature trees around the gasholders</li> <li>Major Hazards Site (former Bromley-by-Bow Gasholders) inner/middle/outer zone</li> <li>APA Tier 3</li> <li>Significant contamination</li> <li>Flood zone 3/2</li> <li>Critical Drainage Area (adjacent)</li> <li>Licensing Saturation Zone</li> <li>AQMA</li> <li>SINC (adjacent and partial)</li> <li>Thames Tideway Tunnel Safeguarding</li> <li>Parks deficiency</li> <li>Delivery of Lea River Park aspirations</li> <li>Airport Safeguarding: consult LCA for all works over 15m &amp; 45m in height (see mapping)</li> <li>Sewers on site may not be diverted (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from Channelsea River;</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>
			Partners	Phasing
			GLA / private developer(s)	Medium to long term
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information

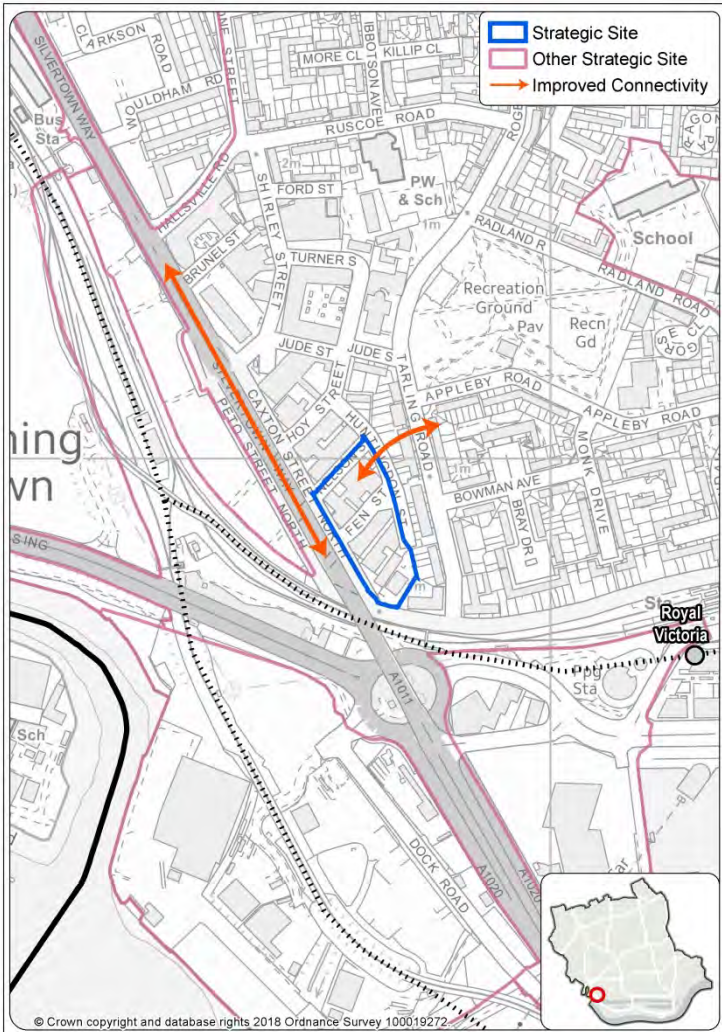
Manor Road	S13	Canning Town & Custom House	<p><b>Residential-led mixed use incorporating high quality, prominent open space with green grid links to Star Park, a considered design response to the land adjacent to the railway and beneath pylons, avoiding its marginalisation, a defined cluster of flexible B1 business space, and town centre commercial and community frontage to the part of the site along Barking Road which lies within the town centre boundary. Quality walking and cycling connections with the town centre and station interchange, the wider neighbourhood and along the Manor Road Key Corridor will be crucial. Indicative building heights of 6 – 8 storeys, stepping up in height to 8 to 12 towards the 'tallest building area' where 20+ storeys may be acceptable, and stepping down towards the existing Area of Townscape Value.</b></p> <p>See also Policies S1, S4, SP4, SP5, SP6, SP7, SP9, J1, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	
<p><b>Map</b></p>			<ul style="list-style-type: none"> <li>SFRA 2017</li> </ul>	
			<p><b>Constraints and Other Advisory Information</b></p> <ul style="list-style-type: none"> <li>PTAL (2021): 6a – 5</li> <li>Employment Hub E8: Canning Town</li> <li>Town Centre (partial)</li> <li>Tall Buildings Area TBA2: Canning Town (partial)</li> <li>Green Space</li> <li>Listed buildings and ATV</li> <li>Parks deficiency</li> <li>APA Tier 3</li> <li>Flood zone 3/2</li> <li>Licensing Saturation Zone</li> <li>Betting Shops and Hot Food Takeaways hotspot</li> <li>AQMA</li> <li>Pylons/power lines</li> <li>Railway</li> <li>Airport Safeguarding: consult LCA for all works over 15m in height (see mapping)</li> <li>Airport noise insulation (see Policy INF2)</li> <li>Water mains on site (Piling Method Statement and consultation with Thames Water required);</li> </ul>	
			<p><b>Partners</b></p> <p>GLA /LBN / Private Developer(s)</p>	
			<p><b>Phasing</b></p> <p>Medium term</p>	
<b>Strategic Site Name</b>	<b>SS ref</b>	<b>Community Neighbourhood</b>	<b>Allocation including tall buildings specifications</b>	<b>Further Sources of Information</b>

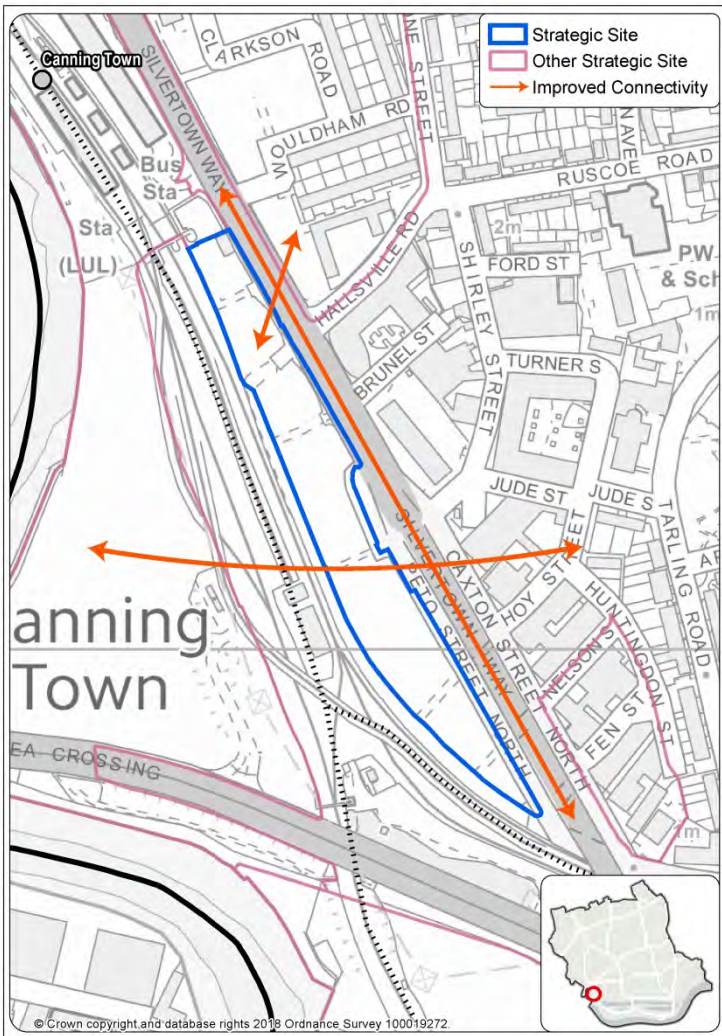


Canning Town Central	S14	Canning Town & Custom House		
Map				
			<p><b>Expanded District Centre</b> abutting a transport hub, moving towards a Major Centre in composition and scale, within a revised boundary to comprise town centre uses notably retail (including anchor uses, food store of up to 6,500 sq.m net, and significant comparison floorspace – up to 25,000 sq.m net) leisure, workspace and civic space making use of the more pleasant street environment created by the re-modelling of the junction and public realm, residential, and community uses. Connections to the Activity Street to the south / south-east, and residential street to the east / north-east, and through to the station interchange and neighbourhoods beyond will be important, together with an integrated town centre that links with existing retail frontages and the market. Indicative heights: Potential for 20 storeys plus, stepping down to address cumulative impacts and transitions at the margins.</p> <p>See also Policies S1, S4, SP4, SP5, SP6, SP7, SP9, J1, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	
			Constraints and Other Advisory Information	
			<ul style="list-style-type: none"> <li>Town Centre Study 2016</li> <li>SFRA 2017</li> <li>HRA screening report (2018);</li> </ul> <ul style="list-style-type: none"> <li>PTAL (2021): 6a – 4</li> <li>Extant planning permission, largely built out (part of the site).</li> <li>Strategic Retail Growth SR2: Canning Town</li> <li>Employment Hub E8: Canning Town</li> <li>Town Centre</li> <li>Listed buildings and ATV (adjacent)</li> <li>APA Tier 3</li> <li>Flood zone 3/2</li> <li>Traffic congestion zone</li> <li>A13 flyover</li> <li>AQMA</li> <li>Parks deficiency</li> <li>Licensing Saturation Zone (partial)</li> <li>Betting Shops and Hot Food Takeaways hotspot</li> <li>Airport Safeguarding: consult LCA for all works over 15m in height (see mapping)</li> <li>Water mains on/adjacent site (Piling Method Statement and consultation with Thames Water required);</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>	
			Partners	Phasing
			LBN/ Private Developer(s)	Short to medium term
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Information

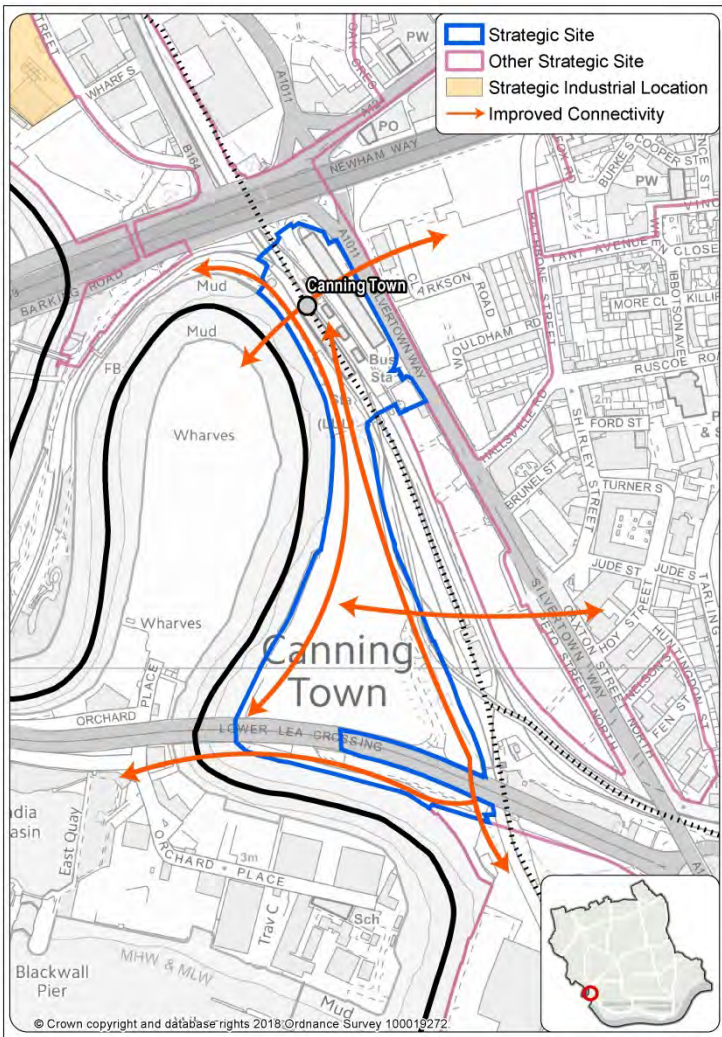
Canning Town East	S15	Canning Town & Custom House	Residential with supporting community uses easily accessible from the town centre to the east, linking to the new residential street connection and green space of at least the existing quantum. Connections also need to be made across the site between uses, avoiding blocking effects, together with enhancement of the setting of the listed church. Indicative building heights of 6 to 8 storeys and a maximum of 15 storeys at key locations forming a transition to the Canning Town tall buildings area, whilst stepping down to surrounding low rise housing and around the listed church.	<ul style="list-style-type: none"><li>SFRA 2017</li></ul>
Map			See also Policies S1, S4, SP4, SP5, SP6, SP7, SP9, J1, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.	Constraints and Other Advisory Information
				<ul style="list-style-type: none"><li>PTAL (2021): 5 - 1a</li><li>Strategic Retail Growth SR2: Canning Town (partial)</li><li>Employment Hub E8: Canning Town (partial)</li><li>Town Centre (partial)</li><li>Listed buildings</li><li>APA Tier 3</li><li>Flood zone 3/2</li><li>A13 flyover/A13</li><li>AQMA</li><li>Parks deficiency</li><li>Licensing Saturation Zone (partial)</li><li>Betting Shops and Hot Food Takeaways hotspot</li><li>Airport Safeguarding: consult LCA for all works &amp; works over 15m in height (see mapping)</li><li>Water mains on/adjacent site (Piling Method Statement and consultation with Thames Water required);</li></ul>
			Partners	Phasing
			LBN/ registered providers/ private developer(s)	Short to medium term
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information



Silvertown Way East	S16	Canning Town & Custom House	<p>Mixed use comprising residential and business use fronting Caxton Street North opposite existing units, and public open space within the urban structure making green grid connections to Keir Hardie recreation ground and dealing with the amenity impacts of traffic. Connections to be made with Activity Street to the north-east, north to the town centre and north-west to the station. Indicative building heights of 6-8 storeys, stepping up to 13 storeys at the northern edge and down to adjoining existing housing.</p> <p>See also Policies S1, S4, SP4, SP5, SP7, SP9, J1, H3, INF1, INF2, INF4, INF6, INF7 and INF9.</p>	<ul style="list-style-type: none"><li>SFRA 2017</li></ul>
Map			Constraints and Other Advisory Information	
			<ul style="list-style-type: none"><li>PTAL (2021): 6a - 3</li><li>Silvertown Tunnel river crossing may have significant amenity implications (if permitted)</li><li>Employment Hub E8: Canning Town</li><li>APA Tier 3</li><li>Listed building (adjacent)</li><li>Flood zone 3/2</li><li>Traffic congestion zone</li><li>A13 flyover</li><li>Parks deficiency</li><li>AQMA</li><li>Airport Safeguarding: consult LCA for all works over 15m in height (see mapping)</li><li>Airport noise insulation (see Policy INF2)</li><li>Water mains on/adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required);</li></ul>	
Partners			Phasing	
LBN/ Private Developer(s)			Medium to long term	
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information

Silvertown Way West	S17	Canning Town & Custom House	Mixed use comprising residential, and business, with commercial units and higher density residential facing the street within the town centre boundary, and business uses extending to face units under arches in Peto Street North. Connectivity to the main town centre and the rest of Canning Town needs to be addressed, together with amenity impacts of traffic. Indicative building heights: potential for 20 + storeys in the tallest building area, stepping down to up to 8-12 storeys.	<ul style="list-style-type: none"><li>Town Centre Study 2016</li><li>SFRA 2017</li></ul>
Map			See also Policies S1, S4, SP4, SP6, SP7, SP9, J1, H3, INF1, INF2, INF4, INF5, INF6, INF7 and INF9.	<b>Constraints and Other Advisory Information</b> <ul style="list-style-type: none"><li>PTAL (2021): 6a – 4</li><li>Extant Planning permission</li><li>Silvertown Tunnel river crossing may have significant amenity implications (if permitted)</li><li>Employment Hub E8: Canning Town</li><li>Town Centre (partial)</li><li>Tallest Buildings Area</li><li>APA Tier 3</li><li>Flood zone 3/2</li><li>Traffic congestion zone</li><li>A13 flyover and rail lines</li><li>AQMA</li><li>Airport Safeguarding: consult LCA for all works over 15m in height (see mapping)</li><li>Airport noise insulation (see Policy INF2)</li><li>Water mains on/adjacent site (Piling Method Statement and consultation with Thames Water required);</li></ul>
				<b>Partners</b> GLA / Private Developer(s)



Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Limmo	S18	Canning Town & Custom House	<p>High quality accessible open space on the peninsular, together, on the eastern side of the station, with town centre uses, new bus station and residential, facilitating an increase in transport hub capacity and through connections. Open space provision, making a significant contribution to the Lea River Park will be enabled by some residential development on the peninsular should access and environmental constraints be overcome. Appropriate connections, including provision for 24 hour non-fare paying access need to be made to the town centre, new and existing neighbourhoods, to the Leamouth Peninsula, and beyond via the Leaway, station and bridges, in line with the spatial vision and policy INF2. Indicative building heights: Potential for 20 storeys plus within Canning Town ‘tallest buildings area’ with remainder of the site stepping down to mid rise 6 to 8 storeys or lower, ensuring spacing between clusters at City Island and Canning Town town centre, and maintaining views to and across the river</p> <p>See also Policies S1, S4, SP4, SP6, SP7, SP9, J1, H3, INF1, INF2, INF4, INF5, INF6, INF7 and INF9.</p>	<ul style="list-style-type: none"><li>SFRA 2017</li><li>PTAL (2021): 6a - 0</li></ul>
Map				<b>Constraints and Other Advisory Information</b> <ul style="list-style-type: none"><li>Employment Hub E8:</li><li>Town Centre (partial) rest of the site outside town centre</li><li>Tallest Buildings Area</li><li>APA Tier 3</li><li>Flood zone 3/2</li><li>Traffic congestion zone</li><li>A13 flyover and rail lines</li><li>AQMA</li><li>Hot food takeaway hotspot (partial)</li><li>Park deficiency</li><li>Pylons/power lines</li><li>Access requirements and station/bus station capacity</li><li>PLA to be consulted early on in development of any new bridging options</li><li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li><li>Airport Safeguarding: consult LCA for all works over 15m in height (Airport noise insulation (see Policy INF2))</li><li>Surface water discharge expected from Bow Creek/Lea River;</li></ul>
			<b>Partners</b> TfL / GLA / Private Developer(s)	<b>Phasing</b> Medium to long term

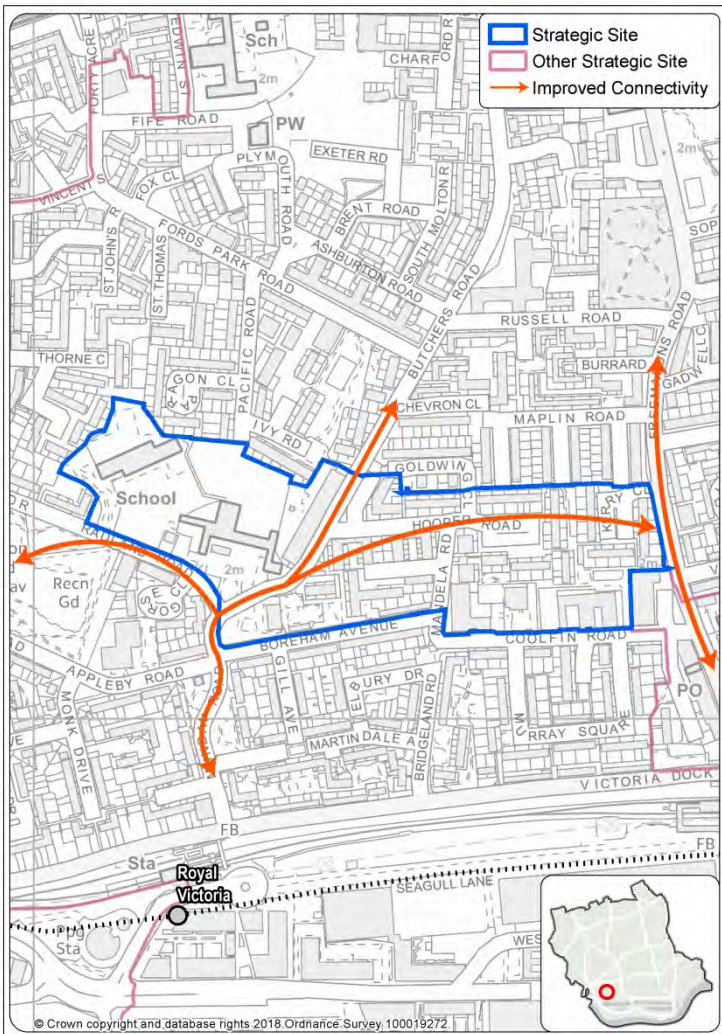


Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Custom House/ Freemasons	S28	Canning Town & Custom House	<p>Intensified residential, community, commercial/ business space, making use of Crossrail potential which will form the nucleus of a renewed and expanded local centre and effective transport interchange including Key Corridor enhancement of Freemasons Road, with improved physical and functional links to ExCeL, and open space linking to the proposed 'Activity Street' to the north-west, and through a series of open spaces to Cundy Park to the south-west. Indicative building heights of 6 to 8 storeys stepping down to integrate with low-rise residential context with scope for 15 storeys at station.</p> <p>See also Policies S1, S4, SP4, SP6, SP7, SP9, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>Town Centre Study 2016</li> <li>SFRA 2017</li> </ul>
Map				Constraints and Other Advisory Information
				<ul style="list-style-type: none"> <li>PTAL (2021): 5 – 3</li> <li>Crossrail operational from 2018</li> <li>Intensification Around Crossrail Stations IC3: Custom House.</li> <li>Local Centre</li> <li>APA Tier 3</li> <li>Flood zone 3/2</li> <li>Licensing Saturation Zone</li> <li>Hot Food Takeaways hotspot</li> <li>Parks deficiency</li> <li>Airport Safeguarding: consult LCA for all works (see mapping)</li> <li>Airport noise insulation (see Policy INF2)</li> <li>Water mains and sewers on site (Piling Method Statement and consultation with Thames Water required);</li> </ul>
			Partners	Phasing
			LBN/Private developer(s)/TfL/ExCeL	Medium term

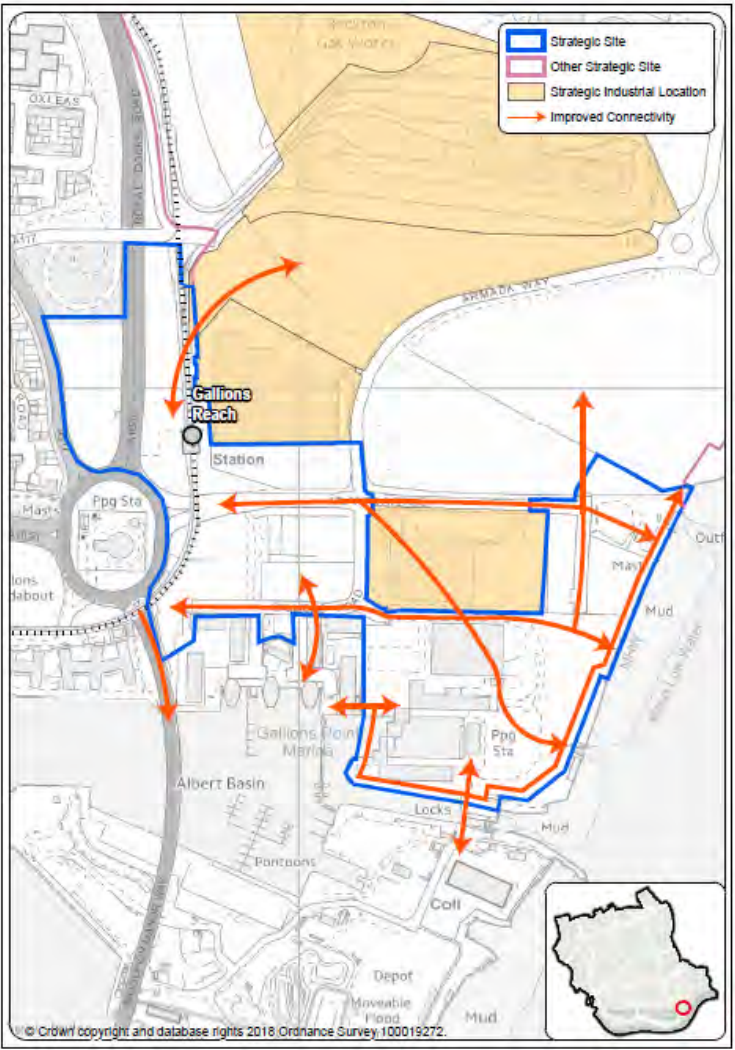
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Royal Victoria West	S30	Canning Town & Custom House	<p>New residential, leisure and cultural uses will be supported at this gateway site to the Royal Docks, high quality public realm and existing water/waterside recreation uses, along with improved walking and cycling links. Connections to the DLR station, Leaway, Canning Town and S08 will be prioritised, with the waterside open space enhanced to form the Newham terminus of the Lea River Park. Indicative building heights: potential for up to 19 storeys subject to addressing cumulative impacts.</p> <p>See also Policies S1, S4, S3, SP4, SP5, SP7, SP9, J1, H3, INF1, INF2, INF4, INF6, INF7 and INF9.</p>	<ul style="list-style-type: none"> <li>SFRA 2017</li> </ul>
Map				Constraints and Other Advisory Information
<p>© Crown copyright and database rights 2018 Ordnance Survey 100019272.</p>				<ul style="list-style-type: none"> <li>PTAL (2021): 4 - 3</li> <li>Partially built out</li> <li>Silvertown Tunnel river crossing may have significant amenity implications (if permitted)</li> <li>Employment Hub E9: ExCeL/Royal Victoria West</li> <li>Cable Car Protection Zone</li> <li>Listed cranes nearby</li> <li>APA Tier 3</li> <li>Flood zone 3/2</li> <li>Parks deficiency</li> <li>AQMA</li> <li>Dockside location therefore protection of SINC / water ecology</li> <li>Airport Safeguarding: consult LCA for all works &amp; works over 15m in height</li> <li>Airport noise insulation (see Policy INF2)</li> <li>Water mains on/adjacent and sewers on site that may not be diverted (Piling Method Statement and consultation with Thames Water required);</li> <li>Partially within Royal Docks Enterprise Zone</li> </ul>
			Partners	Phasing
			GLA/Private developer(s)	Short to medium term



Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Canning Town Riverside	S12	Canning Town & Custom House	<p>Employment led mixed-use facilitating the delivery of the Leaway, including the A13 south ramp and Beubens DLR Bridge improvements, and Lea River Park along the river frontage with retention and buffering of the Strategic Industrial Location (SIL). Development proposals at the northern end will be consistent with the SIL designation, whilst opening up riverside access and connectivity beyond. Should existing uses relocate off the site and wharf safeguarding be removed, subject to Managed Intensification criteria in J2, there is scope for intensification of SIL on a smaller footprint, particularly for modern warehousing with its own access. At the southern end development will incorporate residential with a suitable transition to the SIL and neighbouring employment uses and buffering of the A13, secure improved pedestrian and cycle routes to Canning Town Station and town centre, and provide access to the river frontage and [onward connections to] the Lea River Park. Indicative building heights 8-12 storeys with 20+ storeys in the Tallest Buildings Area.</p> <p>See also Policies S1, S4, SP4, SP7, SP8, SP9, J1, J2, H3, INF1, INF2, INF3, INF4, INF6, INF7 and INF9.</p>	<ul style="list-style-type: none"> <li>SFRA 2017</li> <li>Lea River Park Vision</li> <li>HRA screening report (2018);</li> </ul>
Map				Constraints and Other Advisory Information
				<ul style="list-style-type: none"> <li>PTAL (2021): 6a – 2</li> <li>SIL (partial)</li> <li>Employment Hub E8: Canning Town</li> <li>Wharf safeguarding on site and adjacent [INF1]</li> <li>Tallest Buildings Area (partial)</li> <li>APA Tier 3</li> <li>Flood zone 3/2</li> <li>AQMA</li> <li>Parks deficiency</li> <li>Licensing Saturation Zone</li> <li>Hot Food Takeaways hotspot</li> <li>Pylons/power lines</li> <li>Major Hazards Site (Tower Hamlets) outer zone</li> <li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li> <li>Airport Safeguarding: consult LCA for all works over 15m in height</li> <li>Sewers on site (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from Bow Creek/Lea River</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>
			Partners	Phasing
			GLA / Private Developer(s)	Medium to long term
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Information

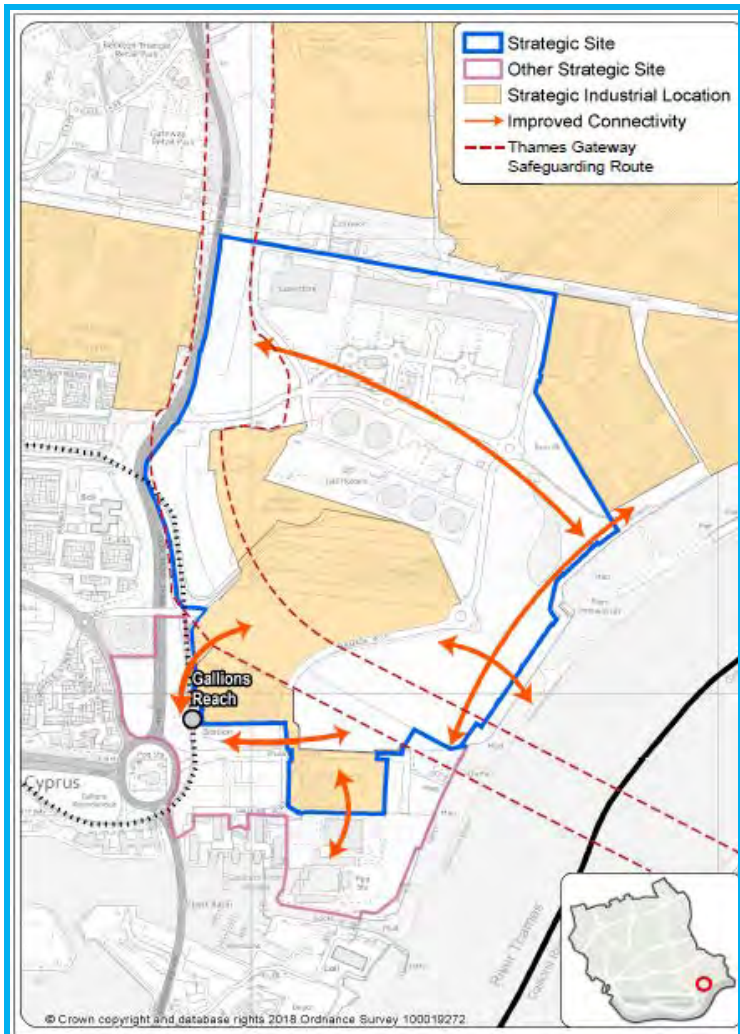
Coolfin North	S06	Canning Town & Custom House	<p>Residential led mixed use to include a new, [potentially all through] or expanded school with flexible community space, together with a key component of the ‘Activity Street’ providing a legible, high quality public realm and linear green grid link between Canning Town town centre and Custom House local centre &amp; transport hub. Indicative building heights 6-8 storeys, stepping up to around 12 storeys at key locations notably along Freemasons Rd.</p> <p>See also Policies S1, S4, SP4, SP7, SP9, J1, J2, H3, INF1, INF2, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"><li>SFRA 2017</li></ul>
Map				<p>Constraints and Other Advisory Information</p> <ul style="list-style-type: none"><li>PTAL (2021): 4 - 3</li><li>Some extant planning permissions (partial)</li><li>APA Tier 3</li><li>Flood zone 3/2</li><li>Parks deficiency</li><li>Hot Food Takeaways hotspot</li><li>Airport Safeguarding: consult LCA for all works over 15m in height</li><li>Airport noise insulation (see Policy INF2)</li><li>Water mains and sewers on site (Piling Method Statement and consultation with Thames Water required);</li></ul>
				
Partners			Phasing	
LBN/Private developer(s)			Medium term	
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information



Albert Basin	S19	Beckton		
Map				
			<p>New housing around Albert Basin will consolidate existing residential development, with a new local centre focused around Gallions Reach DLR station, providing day-to-day shopping, and community uses, with some B1 business space, building on links with UEL and Royal Albert North. Legible walking and cycling routes should be provided through the site to the Beckton Riverside area and from the enhanced DLR station to the waterfront opening this up for public access. Indicative-building heights or 6 to 8 storeys, with some taller elements of up to 13 storeys at key locations.</p> <p>See also Policies S1, S5, SP4, SP6, SP7, SP9, J2, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>Town Centre Study 2016</li> <li>SFRA 2017</li> </ul>
			Constraints and Other Advisory Information	
			<p>Partners</p> <p>LBN/Private developer(s)/TfL/ExCeL</p>	<p>Phasing</p> <p>Short to medium term</p>

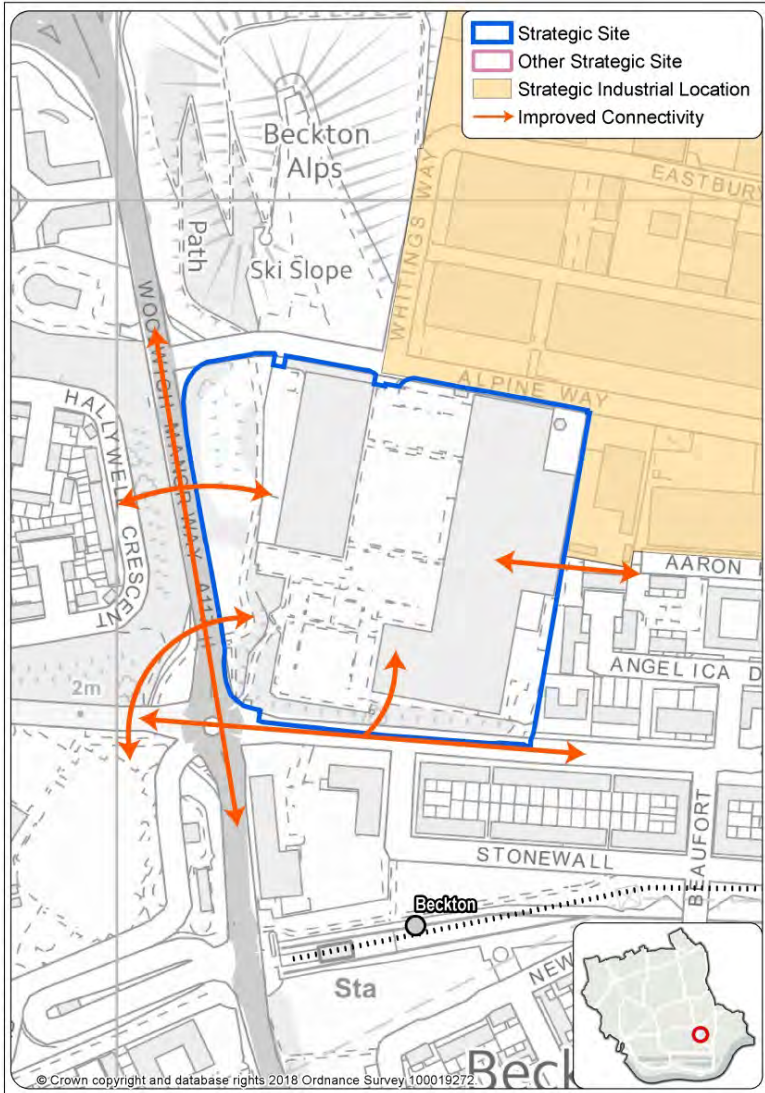
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Royal Albert North	S31	Beckton / Canning Town & Custom House	<p>Business and education uses, building on the strengths of the University of East London and UTC. A link will be created from Beckton Park, bringing the park into the dock and enhancing access for local residents to new employment and training opportunities. Indicative building heights of 6 to 8 storeys and up to 14 at key locations.</p> <p>See also Policies S1, S4, S5, SP4, SP5, SP7, SP9, J1, H3, INF1, INF2, INF4, INF6, INF7, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>SFRA 2017</li> </ul>
<b>Map</b>				<b>Constraints and Other Advisory Information</b>
				<ul style="list-style-type: none"> <li>PTAL (2021): 2</li> <li>Extant planning permission covering the majority of the site; some build out elsewhere</li> <li>Employment Hub E10: Royal Albert</li> <li>Listed buildings</li> <li>APA Tier 3</li> <li>Flood zone 3/2</li> <li>AQMA</li> <li>Parks deficiency</li> <li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li> <li>Airport Safeguarding: consult LCA for all (see mapping)</li> <li>Airport noise insulation (see Policy INF2)</li> <li>Water mains on/adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from surrounding natural watercourse;</li> <li>Within Royal Docks Enterprise Zone</li> </ul>
			<b>Partners</b>	<b>Phasing</b>
			UEL/Private developer(s)	Short to medium term

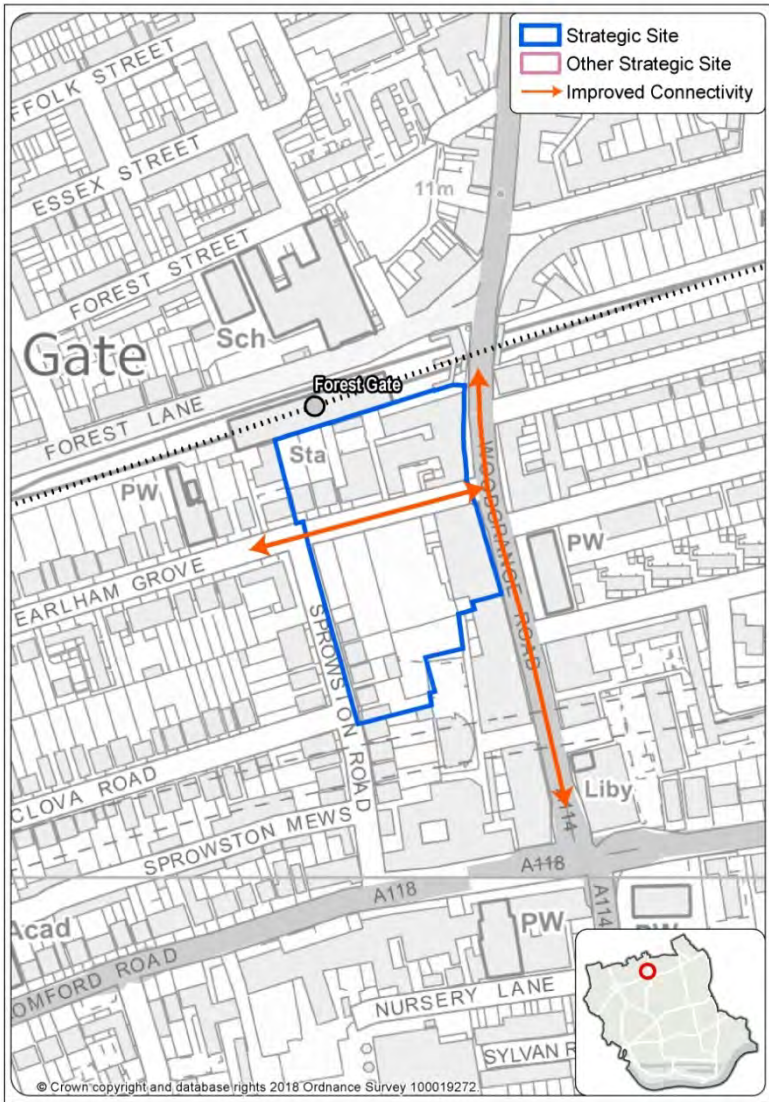


Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Beckton Riverside	S01	Beckton	<p>Mixed use delivering new neighbourhoods centred on a Major town centre and new station and wider transport hub, new and expanded Strategic Infrastructure and other SIL uses. The new neighbourhoods and town centre – comprising residential, pedestrian and cycle links through the site and to the river, proportionate open space and other green infrastructure that opens up riverside access including space that adds to MOL, retail, leisure, supporting community uses notably primary and secondary school provision, and other employment generating uses - will be delivered through partial Managed Release of SIL, appropriate buffering of remaining SIL, and re-formatting and diversification of the existing retail park around the new transport hub, preferably moving it south. New Strategic Infrastructure including an expanded DLR depot to meet growth needs, and river crossing(s), together with the existing CHP plant and legacy gas pressure infrastructure will be accommodated within the site, minimising its spatial impact, where possible allowing for Managed Intensification (and limited release) of associated SIL as per Policy J2 and/or development of further SIL uses. The quantum and functionality of other SIL south of the river crossing safeguarding will be protected, but could be re-located to better effect, securing improved land use transitions and integration given potential compatibility with the DLR depot, neighbouring SIL and bridge footprints. There is scope to incorporate the JWP identified strategic waste management capacity within a comprehensive redevelopment, through the inclusion of a waste facility on remaining SIL; alternatively it should be demonstrated that there is no longer a need for such a facility in that location as per INF3. Indicative building heights of 5 – 8 storeys or less, stepping up to 12 storeys at key locations and up to 19</p>	<ul style="list-style-type: none"><li>Town Centre Study 2016</li><li>SFRA 2017</li><li>HRA screening report (2018);</li></ul>
Map				Constraints and Other Advisory Information
				<ul style="list-style-type: none"><li>PTAL (2021): 3 – 0</li><li>SINCs / MOL</li><li>Employment Hub E1: Beckton</li><li>SIL (partial)</li><li>Thames Gateway Bridge Safeguarding</li><li>APA Tier 3</li><li>Waste site (partial)</li><li>Substantial contamination</li><li>Overhead power lines (safety clearances)</li><li>Major Hazards Site (former Beckton Gasholders) inner/middle/outer zone</li><li>Flood zone 3/2</li><li>AQMA (adjacent)</li><li>Parks deficiency</li><li>DLR depot</li><li>Riverside location [protection of SINC (Thames ecology) and flood defence maintenance (TE2100)]</li><li>Airport Safeguarding: consult LCA for all works &amp; works over 15m in height (see mapping)</li><li>Airport noise insulation (see Policy INF2)</li><li>Water mains on/adjacent site (Piling Method Statement and consultation with Thames Water required);</li><li>PLA to be consulted early on in development of any new river crossing options</li><li>Potential need for impact on Epping</li></ul>



<p>storeys in a new town centre and around a new DLR station.</p> <p>See also Policies S1, S5, SP4, SP6, SP7, SP8, SP9, J1, J2, H3, INF1, INF2, INF3, INF4, INF5, INF6, INF7, INF8 and INF9.</p>	<p>Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</p>
<b>Partners</b>	<b>Phasing</b>
Private developer(s)/TfL	(Medium to) Long term

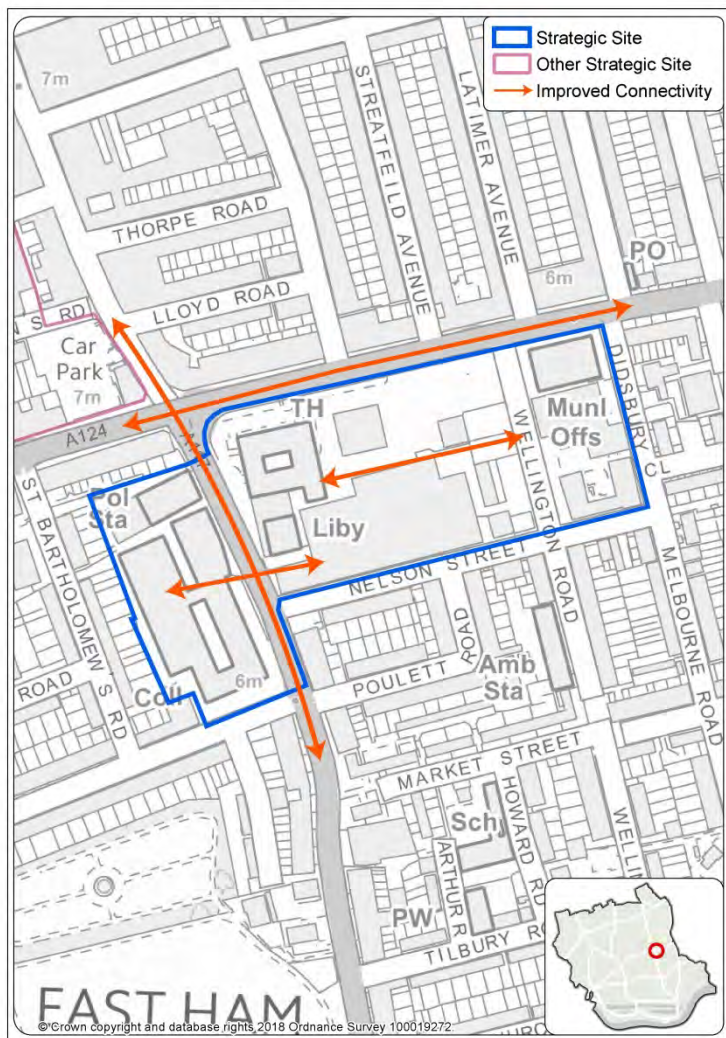
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Alpine Way	S02	Beckton	<p>Mixed use consolidating the neighbourhood centred on Winsor Terrace together with employment uses along Alpine Way complementing the SIL to the north and east. The predominantly residential area on the southern end of the site will have its own dedicated access and improved links to the East Beckton town centre and through to the residential areas to the east and west. Indicative heights: 6 to 8 storeys.</p> <p>See also Policies S1, S5, SP4, SP7, SP8, J1, J2, H3, INF1, INF2, INF8 and INF9.</p>	<ul style="list-style-type: none"><li>SFRA 2017</li></ul>
Map				<p><b>Constraints and Other Advisory Information</b></p> <ul style="list-style-type: none"><li>PTAL (2021): 4 – 1a</li><li>SINC/ green space 246 &amp; 257 (partial)</li><li>Employment hub, partial [J1]</li><li>APA Tier 3</li><li>Flood zone 3/2</li><li>SINC (adjacent)</li><li>Parks deficiency</li><li>Outside the town centre boundary</li><li>Hot Food Takeaways hotspot (partial)</li><li>Airport Safeguarding: consult LCA for all works (see mapping)</li><li>Water mains on/adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required);</li></ul>
			<p><b>Partners</b></p> <p>Private developer(s)</p>	<p><b>Phasing</b></p> <p>Medium to long term</p>

Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Information
Woodgrange Road West	S24	Forest Gate	<p>Mixed use comprising town centre uses including retail, arts and cultural, community, business and residential; limited intensification to take advantage of opportunities afforded by Crossrail. There is potential for higher residential densities closer to Forest Gate Station. Development proposals must demonstrate a positive contribution to local character and distinctiveness with a clear strategy for responding positively to the built heritage and conservation area context of this site. Indicative building heights of 4-6 storeys overall with scope for mid-rise development of up to a maximum of 8 storeys in the vicinity of the station.</p> <p>See also Policies S1, S6, SP4, SP5, SP6, SP7, SP9, J1, H3, INF1, INF2, INF5, INF8 and INF9.</p>	<ul style="list-style-type: none"><li>Forest Gate Town Centre Conservation Area Appraisal and Management Plan</li><li>Town Centre Study 2016</li><li>HRA screening report (2018);</li></ul>
Map				Constraints and Other Advisory Information
				<ul style="list-style-type: none"><li>PTAL (2021): 5</li><li>Some extant planning permissions</li><li>Crossrail station operational from 2018</li><li>Town Centre (partial)</li><li>Employment Hub E14: Forest Gate</li><li>Conservation Area</li><li>Listed buildings</li><li>Licensing Saturation Zone</li><li>Betting Shops and Hot Food Takeaways hotspot</li><li>Traffic Congestion Zone</li><li>Parks deficiency</li><li>Critical Drainage Area (adjacent)</li><li>Airport Safeguarding: consult LCA for all works above 45m in height</li><li>Water mains on/adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required); Thames Waters' Groundwater Resources Team need to be contacted if works are likely to penetrate by more than 15mbgl</li><li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li></ul>
			Partners	Phasing
			Private developer(s)	Short to medium term



Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
East Ham Market	S25	East Ham	<p>Mixed use including retail and residential, together with civic space, East-West connectivity through the site and enhancement of Ron Leighton Way should be incorporated. Indicative building heights of 6 to 8 storeys, and up to 12 storeys at key locations subject to sensitivity to the Conservation Area and listed buildings.</p> <p>See also Policies S1, S6, SP4, SP5, SP6, SP7, SP9, J1, H3, INF1, INF2, INF5, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>Town Centre Study 2016</li> <li>SFRA 2017</li> <li>HRA screening report (2018);</li> </ul>
<b>Map</b>				<b>Constraints and Other Advisory Information</b>
				<ul style="list-style-type: none"> <li>PTAL (2021): 6a</li> <li>Some extant planning permissions</li> <li>Town Centre</li> <li>Employment Hub E7: East Ham Town Centre</li> <li>East Ham Conservation Area (partial/adjacent)</li> <li>Listed buildings</li> <li>APA Tier 2</li> <li>Licensing Saturation Zone</li> <li>Betting Shops and Hot Food Takeaways hotspot</li> <li>AQMA</li> <li>Traffic Congestion Zone</li> <li>Parks deficiency</li> <li>Airport Safeguarding: consult LCA for all works above 45m in height</li> <li>Water mains adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required);</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>
			<b>Partners</b>	<b>Phasing</b>
			Private developer(s)	Medium term

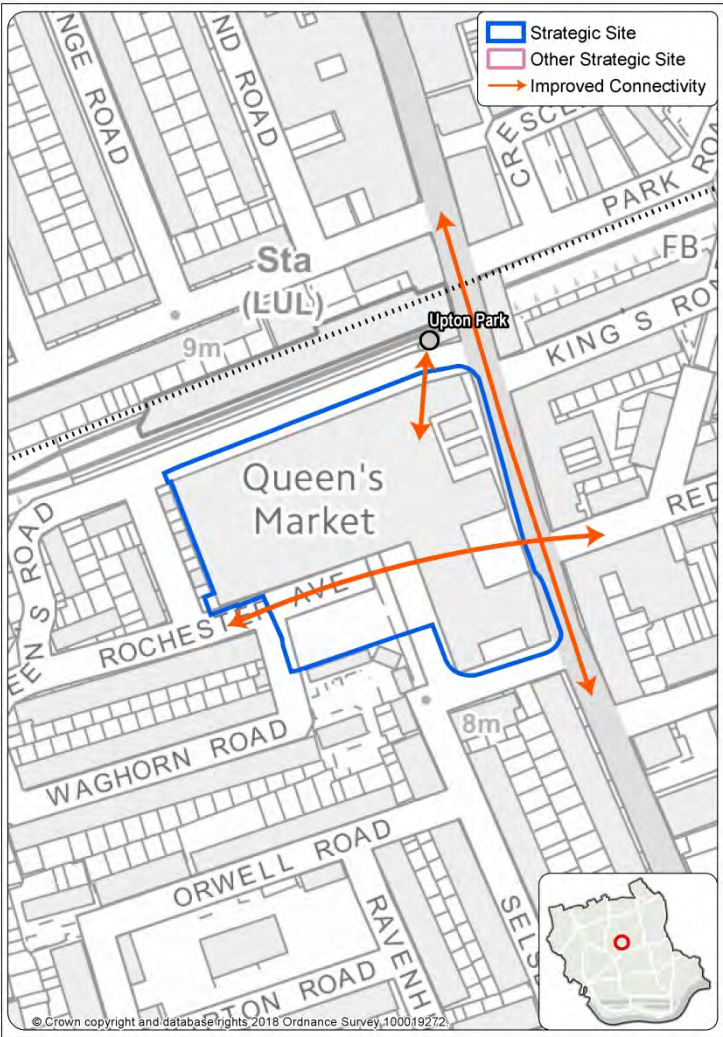
Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
East Ham Town Hall Campus	S26	East Ham	<p>Mixed use comprising retail, incorporating residential, office and community uses, in a scheme sensitive to important heritage and civic assets on the site. Indicative-building heights of 6 to 8 storeys subject to sensitivity to the Conservation Area and listed buildings.</p> <p>See also Policies S1, S6, SP4, SP5, SP6, SP7, SP9, J1, H3, INF1, INF2, INF5, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>Town Centre Study 2016</li> <li>HRA screening report (2018);</li> </ul>
Map				<b>Constraints and Other Advisory Information</b> <ul style="list-style-type: none"> <li>PTAL (2021): 6a – 3</li> <li>Some extant planning permissions</li> <li>Town Centre</li> <li>Employment Hub</li> <li>Conservation Area</li> <li>Listed buildings</li> <li>APA Tier 2</li> <li>Licensing Saturation Zone</li> <li>Betting Shops and Hot Food Takeaways hotspot</li> <li>AQMA</li> <li>Parks deficiency</li> <li>Traffic Congestion Zone</li> <li>Access difficulties/constrained site make it likely that police station and college sites need to be considered together.</li> <li>Parks deficiency</li> <li>Airport Safeguarding: consult LCA for all works above 45m in height</li> <li>Water mains adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required);</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>
			<b>Partners</b>	<b>Phasing</b>
			LBN / Private developer(s)	Medium term





Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
East Ham Western Gateway	S03	East Ham	<p>Mixed use comprising residential and community uses making efficient use of the site. Design and public realm reflecting the town centre gateway location and Key Corridor status. Indicative height: 6 to 8 storeys.</p> <p>See also Policies S1, S6, SP4, SP5, SP6, SP7, SP9, J1, H3, INF1, INF2, INF5, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>HRA screening report (2018);</li> </ul>
Map				<b>Constraints and Other Advisory Information</b> <ul style="list-style-type: none"> <li>PTAL (2021): 6a – 3</li> <li>Community Forum Opportunity Area</li> <li>APA Tier 2</li> <li>Listed buildings and Conservation Area (adjacent)</li> <li>Licensing Saturation Zone</li> <li>Betting Shops and Hot Food Takeaways hotspot</li> <li>AQMA</li> <li>Traffic Congestion Zone</li> <li>Parks deficiency</li> <li>Airport Safeguarding: consult LCA for all works above 45m in height (see mapping)</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>
			<b>Partners</b>	<b>Phasing</b>
			LBN / Private developer(s)	Medium term



Strategic Site Name	SS ref	Community Neighbourhood	Allocation including tall buildings specifications	Further Sources of Information
Queen's Market	S27	Green Street	<p>Mixed use redevelopment comprising retail, residential and community uses (notably healthcare) and including retention of a viable market to provide a central focus for the site's commercial and community role, as well as improvements to the site's relationship with the wider town centre and adjacent station, where step-free access will be facilitated. Indicative building heights of 8 to 12 storeys with potential for a step-up in height of up to 19 storeys at station and stepping down to the low-rise residential context.</p> <p>See also Policy S1, S6, SP4, SP5, SP6, SP7, SP9, J1, H3, INF1, INF2, INF5, INF8 and INF9.</p>	<ul style="list-style-type: none"> <li>Town Centres Study 2016</li> <li>HRA screening report (2018);</li> </ul>
Map			Constraints and Other Advisory Information	
			<ul style="list-style-type: none"> <li>PTAL (2021): 6a</li> <li>Town Centre</li> <li>Asset of Community Value (Queens Market)</li> <li>Employment Hub E6: Green Street Town Centre</li> <li>Listed buildings (adjacent)</li> <li>Licensing Saturation Zone</li> <li>Betting Shops and Hot Food Takeaways hotspot</li> <li>Critical Drainage Area (adjacent)</li> <li>Operational market</li> <li>Airport Safeguarding: consult LCA for all works above 45m in height (see mapping)</li> <li>Water mains on/adjacent and sewers on site (Piling Method Statement and consultation with Thames Water required);</li> <li>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</li> </ul>	
			Partners	Phasing
			LBN / Private developer(s)	Medium term



## Appendix 2 – Non Strategic Site Allocations

Site ref	Site Name	Community Neighbourhood	Address	Allocation	Further Information	Partners and Phasing
HSG1	<b>North of Forest Gate Station E7</b>	Forest Gate	169-180 Forest Lane & 79-119 Woodgrange Road, E7	<b>Residential-led, mixed use</b> <b>See also Policies INF5, S6, SP5</b>	Within Forest Gate Town Centre Conservation Area (refer to Appraisal areas 4 & 7) Medium noise exposure PTAL 4	Private sector Medium to long term
HSG2	<b>Bow Street</b>	Forest Gate	1-2 Bow Street, E15 1HD	<b>Residential</b> <b>See also Policy S6</b>	Medium noise exposure Within AQMA Within APA PTAL 3 Interim use as a hostel has consent until 2020	Public/Private sector Short to medium term
HSG3	<b>Methodist Church Community Centre</b>	Forest Gate	Methodist Church Community Centre, Woodgrange Road, E7 0QH	<b>Residential-led, mixed use</b> <b>See also Policies INF5, S6, SP5</b>	Within Forest Gate Town Centre Conservation Area (refer to Appraisal Area 15). High noise exposure PTAL 4	Private Sector/community group Medium to long term
HSG5	<b>McGrath Road</b>	Forest Gate	3-5 McGrath Road E15 4FA	<b>Residential</b> <b>See also Policy S6</b>	PTAL 2	Public sector Short term
HSG6	<b>236 Romford Road</b>	Forest Gate	236 Romford Road E7 9HZ	<b>Residential</b> <b>See also Policy S6</b>	Within AQMA Within APA High noise exposure PTAL 3	Public/private Short term

HSG7	<b>Wordsworth Avenue</b>	Manor Park	16 Wordsworth Avenue E12 6SU	<b>Residential</b> <b>See also Policy S6</b>	Within APA PTAL 5	Private sector Short term
HSG8	<b>42 West Ham Lane</b>	Stratford and West Ham	42 West Ham Lane, E15 4PT	<b>Residential</b> <b>See also Policy S2</b>	Within AQMA Within APA Medium noise exposure PTAL 6a	Public/Private sector Long term
HSG9	<b>156 - 158 Katherine Road</b>	East Ham/ Green Street	156 - 158 Katherine Road, E6 1ER	<b>Residential</b> <b>See also Policy S6</b>	PTAL 5	Private sector Long term
HSG10	<b>Former Le Bon Club</b>	Stratford and West Ham	Former Le Bon Club / John Street, E15 3EY	<b>Residential</b> <b>See also Policy S2</b>	Within APA PTAL 4	Public/private sector Long term
HSG11	<b>95 Arragon Road</b>	Green Street	95 Arragon Road, E6 1QW	<b>Residential</b> <b>See also Policy S6</b>	PTAL 3	Public/private sector Long term
HSG12	<b>236 – 242 Barking Road</b>	East Ham	236-242 Barking Road, E6 3BB	<b>Residential</b> <b>See also Policy S6</b>	PTAL 4 Within APA Within AQMA High noise exposure	Private sector Medium to long term
HSG13	<b>Nelson Street/ High Street North</b>	East Ham	1-4 Nelson Street, High St North, E6 6EQ	<b>Residential</b> <b>See also Policy S6</b>	Within APA Medium Noise Exposure PTAL 5	Private sector Short term

HSG14	<b>Hartington Close/ Vandome Rd</b>	Canning Town & Custom House	2-32 (evens) Hartington Road, E16 3NP 24-38 (evens) Freemasons Road, E16 3NA Garages at Vandome Close 1-7 (odds) Vandome Close, E16 3SA	<b>Residential</b> <b>See also Policy S4</b>	Within APA Within Flood Zone 2/3 PTAL 2-3	Public/Private sector Medium to long term
HSG16	<b>Grange Road</b>	Canning Town & Custom House	Grange Road (site former 48- 54), E13 0EQ	<b>Residential</b> <b>See also Policy S4</b>	Within APA PTAL 4	Private sector Short term
HSG17	<b>Kent Street - Court Area</b>	Plaistow	Kent Street - Court Area (opposite 1 Kent St), E13 8RL	<b>Residential</b> <b>See also Policy S6</b>	PTAL 4	Public/private Long term
HSG18	<b>Doherty Road</b>	Canning Town & Custom House	Doherty Road (garages, 33A & 35), E13 8DR	<b>Residential</b> <b>See also Policy S4</b>	PTAL 4	Public/private sector Short term
HSG19	<b>Beckton Road</b>	Canning Town & Custom House	3-5 Beckton Road, E16 4DT	<b>Residential</b> <b>See also Policy S4</b>	Within AQMA High noise exposure PTAL 5	Public/private Sector Medium to long term
HSG20	<b>Canning Town Area 4</b>	Canning Town & Custom House	Ashburton Road and Freemasons Road, E16 3QL	<b>Residential</b> <b>See also Policy S4</b>	Within APA PTAL 2	Public/Private sector Medium term
HSG21	<b>Baxter Road/Alnwick Road</b>	Canning Town & Custom House	52 Baxter Road/Alnwick Road (land at corner of), E16 3EZ	<b>Residential</b> <b>See also Policy S4</b>	Within APA PTAL 2	Public/Private sector Short term

HSG22	<b>Balaam Street Garage</b>	Canning Town & Custom House	44-46 Balaam Street, E13 8AQ even odds	<b>Residential</b> <b>See also Policy S6</b>	Within APA Medium noise exposure PTAL 4	Public/Private sector Medium to long term
HSG23	<b>Balaam Leisure Centre</b>	Canning Town & Custom House	26 Balaam St, London E13 8AQ	<b>Residential</b> <b>See also Policy S4</b>	PTAL 4	Public/private sector Long term
HSG24	<b>Cyprus 4</b>	Beckton	Cyprus 4 (Land at Ferndale St), E6	<b>Residential</b> <b>See also Policy S5</b>	Within APA PTAL 3	Private sector Short to medium term
HSG25	<b>ExCel Site 4</b>	Canning Town & Custom House	ExCel Site 4 (Seagull Lane, site adjacent to carpark), E16 1AZ	<b>Residential-led, mixed use</b> <b>See also Policy S3, S4</b>	Within an APA PTAL 2 High noise exposure	Private sector Medium term
HSG26	<b>ExCel Site 3</b>	Canning Town & Custom House	ExCel Site 3 (west End Carpark, Western Gateway), E16 1DR	<b>Residential-led, mixed use</b> <b>See also Policy S3, S4</b>	Within an APA PTAL 2 High noise exposure	Private sector Medium term
HSG27	<b>Leonard Street</b>	Royal Docks	Leonard Street (land corner of Leonard St/Newland St), E16	<b>Residential</b> <b>See also Policy S3</b>	Within APA Medium noise exposure PTAL 2	Public/private sector Long term
HSG28	<b>Former Tate Institute</b>	Royal Docks	Former Tate Institute/ Wythes Road (& 18 Albert Road) E16 2DW	<b>Residential</b> <b>See also Policy S3</b>	Within APA Medium noise exposure PTAL 2	Public/private sector Medium to long term

HSG29	<b>Rymill Street</b>	Royal Docks	Rymill Street E16 (land at junction of Ryland St/Dockland St) E16 2	<b>Residential</b> <b>See also Policy S3</b>	Within APA High noise exposure PTAL 2	Public/private sector Short to medium term
HSG30	<b>Barrier Park North</b>	Royal Docks	Barrier Park North (North Woolwich Road, carpark adjacent to Barrier Park) E16	<b>Residential</b> <b>See also Policy S3</b>	Within an APA PTAL 2 Medium noise exposure	Public/Private sector Medium term
HSG31	<b>Albert Road/Fernhill Street</b>	Royal Docks	268 Albert Road/242 Fernhill Street E16 2HX	<b>Residential</b> <b>See also Policy S3</b>	Within APA Medium noise exposure PTAL 2	Public/private sector Long term
HSG32	<b>Abbey House</b>	Stratford and West Ham	Abbey House, Bakers Row, E15 3NB	<b>Residential-led, mixed use</b> <b>See also Policy S2</b>	Within APA PTAL 2-4	Private sector Short to medium term
HSG33	<b>15-21 Leytonstone Road</b>	Stratford and West Ham	15-21 Leytonstone Road, E15 1JA	<b>Residential-led, mixed use (in accordance with CFOA and MBOA)</b> <b>See also Policy S2</b>	Within APA Within AQMA High noise exposure PTAL 6b	Private sector Short to medium term
HSG34	<b>David Street</b>	Stratford and West Ham	1-15 David Street (garage site, E15)	<b>Residential</b> <b>See also Policy S2</b>	PTAL 6a	Public/Private sector Medium term
HSG35	<b>Rosebery Avenue</b>	Manor Park	Rear of 100 Rosebery Avenue, E12 6PS	<b>Residential</b> <b>See also Policy S6</b>	PTAL 1b - 3	Private sector Long term
HSG36	<b>Prince Regent Lane</b>	Plaistow	9-11 Prince Regent Lane (Falcon Carriage site), E13 8RH	<b>Residential</b> <b>See also Policy S6</b>	Within APA High noise exposure Within AQMA PTAL 4	Private sector Long term

## Appendix 3 – Protected Green Space

Site ID	Area (ha)	Type	London Plan Designation	Access	Other Designation	Community Neighbourhood	Approximate Postcode
GS1	2.03	Linear Open Space	Linear Open Space	Public Access	SINC, Green Belt	Manor Park	E12 5DS
GS2	1.02	Allotment	No Designation	No Public Access	SINC, Green Belt	Manor Park	E12 5DS
GS3	67.75	Cemetery	No Designation	Public Access	SINC, Green Belt	Manor Park	E12 5DG
GS4	0.25	Woodland	No Designation	No Public Access		Forest Gate	E7 0EF
GS5	0.26	Amenity	Pocket Park	Public Access		Manor Park	E12 5NR
GS6	0.25	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5JB
GS7	0.14	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5DS
GS8	8.18	Open Space	Metropolitan Park	Public Access	SINC, Green Belt	Manor Park	E12 5DF
GS9	0.04	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5JA
GS10	0.13	Education Land	No Designation	No Public Access		Manor Park	E12 5PB
GS11	0.40	Amenity / Play	Pocket Park	Public Access		Manor Park	E12 5FB
GS12	17.09	Cemetery	No Designation	Public Access	SINC	Manor Park	E12 5BX
GS13	0.03	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5HT
GS14	0.04	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5BP
GS15	0.07	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5BP
GS16	12.21	Cemetery	No Designation	Public Access	SINC	Forest Gate	E15 1SP
GS17	0.01	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5BP
GS18	0.26	Education Land	No Designation	No Public		Forest Gate	E7 0JW



				Access			
GS19	0.03	Estate Amenity	Pocket Park	Public Access		Forest Gate	E7 0HQ
GS20	0.03	Railway Land	No Designation	No Public Access	SINC	Manor Park	E7 0NP
GS21	0.17	Estate Amenity / Play	Pocket Park	Public Access		Forest Gate	E7 0HQ
GS22	0.10	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5AX
GS23	0.01	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E7 0NP
GS24	0.01	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E7 0NS
GS25	0.03	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E7 0NT
GS26	10.46	Park	Local Park & Open Space	Public Access	SINC, MOL	Manor Park	E12 5LY
GS27	0.67	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E12 5BB
GS28	0.17	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E7 0NH
GS29	0.42	Play / Sports Pitch	Small Open Space	Public Access		Forest Gate	E7 9BL
GS30	0.29	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5AD
GS31	1.26	Landscape Buffer	No Designation	No Public Access	SINC, MOL	Manor Park	E12 5NA
GS32	0.26	Amenity	Pocket Park	Public Access		Stratford & West Ham	E15 1TT
GS33	0.35	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E7 0NF
GS34	1.04	Park	Small Open Space	Public Access		Stratford & West Ham	E15 1DZ
GS35	0.45	Education Land	No Designation	No Public Access		Manor Park	E12 6AR
GS36	0.10	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E7 0NA
GS37	0.11	Estate Amenity	Pocket Park	Public Access		Manor Park	E12 6BE

GS38	0.39	Open Space	No Designation	No Public Access		Stratford & West Ham	E15 1AB
GS39	0.24	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 5AF
GS40	0.14	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 6AB
GS41	0.09	Estate Amenity	Pocket Park	Public Access		Forest Gate	E15 1QZ
GS42	0.34	Church Yard	No Designation	Public Access	SINC	Manor Park	E12 6HA
GS43	0.08	Education Land	No Designation	No Public Access	SINC	Manor Park	E12 6HA
GS44	1.80	Park	Small Open Space	Public Access	SINC	Forest Gate	E15 1RL
GS45	0.21	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 6AD
GS46	0.05	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E7 9AP
GS47	0.20	Amenity / Play	Pocket Park	Public Access	SINC	Forest Gate	E7 9BZ
GS48	0.13	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 6UJ
GS49	0.13	Amenity / Play	Pocket Park	Public Access		Stratford & West Ham	E15 1JJ
GS50	0.34	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E15 4NT
GS51	0.29	Education Land	No Designation	No Public Access		Stratford & West Ham	E15 1JY
GS52	6.66	Cemetery	No Designation	Public Access	SINC	Manor Park	E12 6UG
GS53	0.59	Education Land	No Designation	No Public Access		Manor Park	E12 6ET
GS54	0.14	Estate Amenity	No Designation	No Public Access		Forest Gate	E7 0QS
GS55	0.31	Education Land	No Designation	No Public Access		Forest Gate	E15 1HB
GS56	0.41	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 6AG
GS57	0.17	Railway Land	No Designation	No Public	SINC	Forest Gate	E7 9AL

				Access			
GS58	0.42	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 6QS
GS59	0.56	Allotment	No Designation	No Public Access	MOL	Manor Park	E12 6JL
GS60	0.16	Estate Amenity	No Designation	No Public Access		Manor Park	E12 6JD
GS61	0.25	Education Land	No Designation	No Public Access		Manor Park	E12 6PW
GS62	0.19	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E15 4NR
GS63	0.15	Railway Land	No Designation	No Public Access	SINC	Forest Gate	E15 4NL
GS64	0.09	Play / Amenity	Pocket Park	Public Access		Manor Park	E12 6JF
GS65	0.23	Church Yard	No Designation	Public Access		Forest Gate	E7 8BD
GS66	0.38	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 6JA
GS67	1.76	Playing Field / Sports Pitch	No Designation	No Public Access	MOL	Manor Park	E12 6JL
GS68	0.60	Open Space	No Designation	No Public Access	SINC, MOL	Manor Park	E12 6JL
GS69	0.34	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 6LB
GS70	0.21	Railway Land	No Designation	No Public Access	SINC, MOL	Manor Park	E12 6JL
GS71	0.74	Amenity / Play	Small Open Space	Public Access		Manor Park	E12 6LR
GS72	0.03	Railway Land	No Designation	No Public Access	SINC	East Ham	E12 6LU
GS73	0.01	Railway Land	No Designation	No Public Access	SINC	East Ham	E6 2AU
GS74	0.26	Railway Land	No Designation	No Public Access	SINC	East Ham	E6 2AS
GS75	0.03	Railway Land	No Designation	No Public	SINC	East Ham	E6 2AU

				Access			
GS76	0.05	Railway Land	No Designation	No Public Access	SINC	East Ham	E6 2AU
GS77	5.18	Cemetery	No Designation	Public Access		Manor Park	E12 6PG
GS78	0.25	Railway Land	No Designation	No Public Access	SINC	Stratford & West Ham	E15 1BJ
GS79	0.05	Play	Pocket Park	Public Access		Forest Gate	E7 9HQ
GS80	0.13	Estate Amenity	Pocket Park	Public Access		Forest Gate	E15 4JJ
GS81	0.39	Railway Land	No Designation	No Public Access	SINC	East Ham	E6 2AL
GS82	8.54	Open Space	No Designation	No Public Access	MOL	East Ham	E6 2AS
GS84	1.03	Football Ground	No Designation	No Public Access		Forest Gate	E7 9JT
GS85	0.03	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 6LL
GS86	7.57	Park	Local Park & Open Space	Public Access	SINC	Manor Park	E12 6SR
GS87	0.59	Church Yard	No Designation	Public Access		Stratford & West Ham	E15 1NG
GS88	0.10	Railway Land	No Designation	No Public Access	SINC	Manor Park	E12 6SE
GS89	0.41	Railway Land	No Designation	No Public Access	SINC	East Ham	E6 2AL
GS90	0.45	Education Land	No Designation	No Public Access		Manor Park	E12 6SR
GS91	0.52	Education Land	No Designation	No Public Access		Green Street	E7 9PS
GS92	26.67	Park	District Park	Public Access	SINC	Stratford & West Ham	E15 3QJ
GS93	0.30	Railway Land	No Designation	No Public Access	SINC	Manor Park	E6 1BG
GS94	6.79	Open Space	No Designation	No Public Access	SINC, MOL	East Ham	E6 2BP
GS95	0.20	Railway Land	No Designation	No Public	SINC	East Ham	E6 1JB

				Access			
GS96	0.35	Education Land	No Designation	No Public Access		Green Street	E6 1AA
GS97	4.30	Park	Local Park & Open Space	Public Access		Stratford & West Ham	E15 4DR
GS98	0.43	Education Land	No Designation	No Public Access		Stratford & West Ham	E15 3NT
GS99	0.14	Railway Land	No Designation	No Public Access	SINC	Green Street	E6 1BW
GS100	0.24	Amenity	Pocket Park	Public Access		Stratford & West Ham	E15 4AJ
GS101	0.10	Amenity	Pocket Park	Public Access		Stratford & West Ham	E15 4AL
GS102	0.15	Railway Land	No Designation	No Public Access	SINC	Green Street	E6 1EU
GS103	0.08	Open Space	No Designation	Public Access		East Ham	E6 2LP
GS104	0.44	Amenity	Small Open Space	Public Access		Stratford & West Ham	E15 3HU
GS105	0.36	Education Land	No Designation	No Public Access		Stratford & West Ham	E15 3HU
GS106	0.10	Open Space	No Designation	Public Access		East Ham	E6 2LP
GS107	0.09	Railway Land	No Designation	No Public Access	SINC	Green Street	E6 1EA
GS108	0.21	Railway Land	No Designation	No Public Access	SINC	Green Street	E6 1DU
GS109	0.30	Education Land	No Designation	No Public Access	SINC, MOL	East Ham	E6 2LP
GS110	0.71	Church Yard	No Designation	Public Access	SINC	Stratford & West Ham	E15 3HU
GS111	0.05	Estate Amenity	No Designation	No Public Access		Stratford & West Ham	E15 3JY
GS112	3.23	Park	Local Park & Open Space	Public Access	MOL	East Ham	E6 2LP
GS113	0.11	Estate Amenity	No Designation	No Public Access		Stratford & West Ham	E15 3PY
GS114	0.05	Railway Land	No Designation	No Public Access	SINC	Green Street	E13 9AT

GS115	0.20	Amenity	Pocket Park	Public Access		Stratford & West Ham	E15 3NT
GS116	0.07	Railway Land	No Designation	No Public Access	SINC	Green Street	E13 9AT
GS117	0.89	Amenity / Play	Small Open Space	Public Access		Stratford & West Ham	E15 3NN
GS118	0.15	Amenity	Pocket Park	Public Access		Green Street	E6 1DT
GS119	0.03	Amenity	Pocket Park	Public Access		Green Street	E6 1HB
GS120	0.20	Education Land	No Designation	No Public Access		Stratford & West Ham	E15 3HZ
GS121	3.03	Park	Local Park & Open Space	Public Access	SINC	Green Street	E6 1PX
GS122	0.13	Estate Amenity	Pocket Park	Public Access		Plaistow	E13 0NJ
GS123	0.22	Railway Land	No Designation	No Public Access	SINC	Green Street	E13 0SE
GS124	0.20	Railway Land	No Designation	No Public Access	SINC	Plaistow	E13 0PE
GS125	0.05	Play	Pocket Park	Public Access		Plaistow	E13 0NJ
GS126	1.50	Landscape Buffer	No Designation	No Public Access	SINC	East Ham	IG117BG
GS127	0.29	Amenity / Play	Pocket Park	Public Access		Stratford & West Ham	E15 3JZ
GS128	0.30	Estate Amenity	No Designation	No Public Access		Green Street	E13 9AX
GS129	0.20	Railway Land	No Designation	No Public Access	SINC	Plaistow	E13 0PB
GS130	1.43	Open Space	No Designation	No Public Access	SINC	East Ham	E6 2PS
GS131	0.18	Railway Land	No Designation	No Public Access	SINC	Plaistow	E13 0PE
GS132	11.07	Education Land	No Designation	No Public Access	MOL	East Ham	E6 2LP
GS133	0.04	Estate Amenity	No Designation	No Public Access		Stratford & West Ham	E15 3DP
GS134	0.21	Open Space	Pocket Park	No Public Access		Stratford & West Ham	E15 3NF



GS135	0.08	Estate Amenity	No Designation	No Public Access		Stratford & West Ham	E15 3DP
GS136	1.83	Allotment	No Designation	No Public Access		Plaistow	E13 9AQ
GS137	0.95	Sports Ground	No Designation	No Public Access		Green Street	E13 9AX
GS138	0.04	Railway Land	No Designation	No Public Access	SINC	Plaistow	E13 0LJ
GS139	0.66	Open Space	Small Open Space	Public Access		Plaistow	E13 0JH
GS140	0.03	Railway Land	No Designation	No Public Access	SINC	Plaistow	E13 0HZ
GS141	0.82	Open Space	Small Open Space	Public Access		Plaistow	E13 0SA
GS142	0.01	Railway Land	No Designation	No Public Access	SINC	Plaistow	E13 0HZ
GS143	0.09	Amenity	Pocket Park	Public Access		Green Street	E6 1QB
GS144	0.27	Education Land	No Designation	No Public Access		Plaistow	E13 9DQ
GS145	0.29	Linear Open Space	Linear Open Space	Public Access	SINC, MOL	East Ham	E6 2PP
GS146	0.29	Education Land	No Designation	No Public Access		Plaistow	E13 9DQ
GS147	1.80	Waterway	No Designation	No Public Access	SINC	East Ham	E6 2PP
GS148	3.45	Playing Field	No Designation	No Public Access		East Ham	E6 2RU
GS149	0.18	Railway Land	No Designation	No Public Access	SINC, MOL	Plaistow	E13 0EB
GS150	0.15	Landscape Buffer	No Designation	No Public Access	SINC, MOL	East Ham	IG117BG
GS151	0.05	Railway Land	No Designation	No Public Access	SINC, MOL	Stratford & West Ham	E15 3HB
GS152	2.06	Playing Field	No Designation	No Public Access		Plaistow	E13 0BH
GS153	3.63	Open Space	Local Park & Open	Public Access	SINC, MOL	East Ham	IG117BG

			Space				
GS154	9.89	Park	Local Park & Open Space	Public Access	SINC	East Ham	E6 3AA
GS155	0.26	Waterway	No Designation	No Public Access	SINC, MOL	East Ham	IG117NZ
GS156	0.15	Linear Open Space	Linear Open Space	Public Access	SINC, MOL	East Ham	IG117NZ
GS157	0.39	Amenity / Play / Sports Pitch	Pocket Park	Public Access		Plaistow	E13 0DG
GS158	0.52	Waterway	No Designation	No Public Access	SINC	Stratford & West Ham	E15 3NY
GS159	0.08	Amenity	Pocket Park	Public Access		Plaistow	E13 0DG
GS160	0.04	Landscape Buffer	No Designation	No Public Access		Plaistow	E13 0DR
GS161	0.75	TBC	Small Open Space	Public Access		Plaistow	E13 9LN
GS162	0.20	Amenity	Pocket Park	Public Access		Plaistow	E13 8AZ
GS163	3.94	Allotment	No Designation	No Public Access	MOL	East Ham	E6 6BX
GS164	0.06	Waterway	No Designation	No Public Access		Beckton	IG110AD
GS165	0.37	Education Land	No Designation	No Public Access		East Ham	E6 3PA
GS166	0.30	Landscape Buffer	No Designation	No Public Access		Beckton	IG110AD
GS167	1.34	Waterway	No Designation	No Public Access	MOL	East Ham	E6 6AZ
GS168	12.24	Park	Local Park & Open Space	Public Access		Custom House & Canning Town	E13 0EA
GS169	0.04	Amenity	Pocket Park	Public Access		East Ham	E6 6BB
GS170	0.15	Estate Amenity	No Designation	No Public Access		East Ham	E6 6AU
GS171	3.81	Park	Local Park & Open Space	Public Access		Plaistow	E13 0AS
GS172	11.91	Cemetery	No Designation	Public Access	SINC	Custom House & Canning	E13 0DR

						Town	
GS173	1.23	Open Space / Grazing Land	No Designation	No Public Access	MOL	Beckton	IG110AD
GS174	0.68	Waterway	No Designation	No Public Access	MOL	East Ham	E6 6AX
GS175	2.34	Sports Pitch	No Designation	No Public Access	MOL	Beckton	IG110AD
GS176	0.29	Community Garden	No Designation	No Public Access		Plaistow	E13 0EQ
GS177	0.25	Amenity	Pocket Park	Public Access		Plaistow	E13 8RJ
GS178	6.16	Open Space	No Designation	No Public Access	SINC, MOL	Beckton	IG110AD
GS179	2.68	Allotment	No Designation	No Public Access	MOL	East Ham	E6 6AX
GS180	1.21	Waterway	No Designation	No Public Access	MOL	Beckton	E6 6LH
GS181	0.25	Grounds	No Designation	No Public Access		Plaistow	E13 8RL
GS182	0.70	Linear Open Space	Linear Open Space	Public Access	MOL	Beckton	E6 6LH
GS183	1.51	Waterway	No Designation	No Public Access		Beckton	IG110AD
GS184	0.03	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E13 0EF
GS185	2.65	Open Space / Woodland	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 4TG
GS186	0.08	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E13 8AN
GS187	0.08	Estate Amenity	Pocket Park	Public Access		Custom House & Canning Town	E13 0EG
GS188	0.02	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E13 8AN
GS189	0.50	Linear Open Space	Linear Open Space	Public Access		Beckton	E6 6LH
GS190	0.87	Waterway / Woodland	No Designation	No Public		Beckton	E6 6LH

				Access			
GS191	18.08	Linear Open Space (Greenway)	Linear Open Space	Public Access	SINC, MOL, LVRPA	Borough Wide	E13 0AN
GS192	6.81	Park	Local Park & Open Space	Public Access	MOL	East Ham	E6 6AJ
GS193	0.65	Waterway / Grazing Land	No Designation	No Public Access		Beckton	IG110AD
GS194	9.77	Cemetery	No Designation	Public Access		East Ham	E6 3NN
GS195	3.28	Education Land	No Designation	No Public Access		East Ham	E6 3LB
GS196	0.73	Waterway / Woodland	No Designation	No Public Access		Beckton	E6 6LH
GS197	0.12	Education Land	No Designation	No Public Access		Custom House & Canning Town	E13 0EH
GS198	0.19	Estate Amenity	No Designation	No Public Access		East Ham	E6 3QY
GS199	0.28	Estate Amenity	No Designation	No Public Access		East Ham	E6 3QY
GS200	4.14	Amenity / Play	Local Park & Open Space	Public Access		Custom House & Canning Town	E13 0EH
GS201	0.06	Amenity	Pocket Park	Public Access		East Ham	E6 3QY
GS202	0.18	Open Space	No Designation	No Public Access		East Ham	E6 6HR
GS203	0.71	Linear Open Space	Linear Open Space	Public Access		Beckton	E6 6JF
GS204	0.40	Estate Amenity	No Designation	No Public Access		East Ham	E6 3PH
GS205	1.32	Grounds	No Designation	No Public Access		Plaistow	E13 8RT
GS206	1.17	Amenity / Woodland	Small Open Space	Public Access	SINC	Custom House & Canning Town	E3 3JQ
GS207	0.36	Education Land	No Designation	No Public Access		Custom House & Canning Town	E13 8DD
GS208	0.02	Estate Amenity	No Designation	No Public		Plaistow	E13 8RP

				Access			
GS209	0.19	Open Space	No Designation	No Public Access		Custom House & Canning Town	E13 8BY
GS210	0.05	Estate Amenity	Pocket Park	Public Access		Plaistow	E13 8RP
GS211	3.73	Church Yard / Nature Reserve	Local Park & Open Space	Public Access	SINC	East Ham	E6 3PG
GS212	12.78	Linear Open Space	Linear Open Space	Public Access	Part SINC, MOL	Beckton	E6 7FF
GS212a	3.18	Linear Open Space	Linear Open Space	Public Access	MOL	Beckton	E16 2BF
GS213	0.18	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 4HX
GS214	1.42	Amenity / Woodland	Small Open Space	Public Access		Beckton	E6 6JF
GS215	0.07	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 4JS
GS216	3.51	Education Land	No Designation	No Public Access		Plaistow	E13 8BL
GS217	3.08	Education Land	No Designation	No Public Access		Custom House & Canning Town	E16 4NH
GS218	2.44	Open Space	No Designation	No Public Access	SINC	Beckton	E6 7FF
GS219	0.22	Landscape Buffer	No Designation	No Public Access		Beckton	E6 6JF
GS220	0.08	Woodland	No Designation	No Public Access		East Ham	E6 3SR
GS221	1.40	Education Land	No Designation	No Public Access		Plaistow	E13 8BF
GS222	5.67	Education Land	No Designation	No Public Access		East Ham	E13 8BL
GS223	0.37	Play / Amenity	Pocket Park	Public Access		East Ham	E6 3RZ
GS224	2.16	Open Space / Woodland	No Designation	No Public Access		Beckton	E6 6JF
GS225	0.45	Linear Open Space	Linear Open Space	Public Access	SINC	Plaistow	E13 8BL
GS226	1.82	Open Space	No Designation	No Public Access		Plaistow	E13 8BL

GS227	0.17	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E13 8JJ
GS228	4.49	Amenity / Vacant Land	Local Park & Open Space	Part Public Access	SINC	Beckton	E6 6JF
GS229	0.30	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 4HL
GS230	0.04	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E13 8EL
GS231	0.29	Landscape Buffer	No Designation	No Public Access	SINC	Plaistow	E13 8BL
GS232	0.06	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 4HH
GS233	1.80	Education Land	No Designation	No Public Access		Beckton	E6 5NX
GS234	5.37	Open Space	No Designation	Public Access		Plaistow	E13 8BL
GS235	4.02	Park	Local Park & Open Space	Public Access	SINC	Custom House & Canning Town	E16 4PN
GS236	0.21	Estate Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 4HL
GS237	0.12	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 4AS
GS238	0.24	Open Space	No Designation	No Public Access		Beckton	E6 5NX
GS240	10.56	Park	District Park	Public Access	SINC, MOL	Beckton	E16 3LJ
GS241	2.62	Linear Open Space	No Designation	No Public Access	SINC	Beckton	E6 7FF
GS242	0.12	Open Space	No Designation	No Public Access		Custom House & Canning Town	E16 3LJ
GS243	0.29	Amenity / Play	Pocket Park	Public Access		Custom House & Canning Town	E16 4AA
GS244	0.12	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 3SU
GS245	0.07	Amenity	Pocket Park	Public Access		Beckton	E6 5UH



GS246	0.94	Amenity	Small Open Space	Public Access	SINC	Beckton	E6 5NT
GS247	0.06	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E13 8JX
GS248	0.32	Education Land	No Designation	No Public Access		Custom House & Canning Town	E16 3LJ
GS249	1.34	Woodland	No Designation	No Public Access		Beckton	E6 5NX
GS250	0.34	Amenity	Pocket Park	Public Access		Beckton	E6 5XW
GS251	0.37	Amenity	Pocket Park	Public Access		Beckton	E6 5YF
GS252	0.45	Open Space	No Designation	No Public Access	SINC, MOL	Beckton	IG110DS
GS253	0.37	Amenity	Pocket Park	Public Access		Beckton	E6 5LY
GS254	0.48	Waterway	No Designation	No Public Access	SINC	Custom House & Canning Town	E14 0LA
GS255	0.62	Amenity	Small Open Space	Public Access		Custom House & Canning Town	E16 4HB
GS256	0.43	Linear Open Space	Linear Open Space	Public Access		Beckton	E6 5LY
GS257	0.22	Landscape Buffer	No Designation	No Public Access	SINC	Beckton	E6 5NT
GS258	0.10	Amenity	Pocket Park	Public Access		Beckton	E6 5TH
GS259	7.75	Park	Local Park & Open Space	Public Access		Custom House & Canning Town	E16 3JJ
GS260	0.04	Estate Amenity	Pocket Park	Public Access		Beckton	E6 5TR
GS261	1.18	Linear Open Space	Linear Open Space	Public Access		Beckton	E6 5RG
GS262	0.57	Linear Open Space	Linear Open Space	Public Access		Beckton	E6 6LE
GS263	0.73	Amenity	Small Open Space	Public Access		Beckton	E6 5LW
GS264	0.07	Railway Land	No Designation	No Public Access		Beckton	E6 5NT
GS265	0.25	Railway Land	No Designation	No Public Access		Beckton	E6 6LE
GS266	0.07	Open Space / Woodland	No Designation	No Public Access		Beckton	E6 5NT
GS267	0.15	Amenity	Pocket Park	Public Access		Beckton	E6 6WH

GS268	0.21	Amenity / Sports Pitch	Pocket Park	Public Access		Custom House & Canning Town	E16 1JQ
GS269	0.83	Amenity / Woodland	Small Open Space	Public Access	SINC	Custom House & Canning Town	E16 1PN
GS270	1.60	Education Land	No Designation	No Public Access		Custom House & Canning Town	E16 3LU
GS271	0.22	Grounds	No Designation	No Public Access		Beckton	E6 5PA
GS272	0.54	Education Land	No Designation	No Public Access		Beckton	E6 6LE
GS273	1.32	Amenity / Play / Woodland	Small Open Space	Public Access		Beckton	E6 5LW
GS274	3.57	Woodland	No Designation	No Public Access		Beckton	E6 6LE
GS275	3.55	Education Land	No Designation	No Public Access		Beckton	E6 5JG
GS276	0.31	Estate Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 3RH
GS277	0.99	Linear Open Space	Linear Open Space	Public Access	SINC, MOL	Beckton	E6 5LW
GS278	0.79	Linear Open Space	Linear Open Space	Public Access		Beckton	E6 5RN
GS279	0.32	Woodland	No Designation	No Public Access		Beckton	E6 5QY
GS280	0.68	Allotment	No Designation	No Public Access	SINC, MOL	Beckton	E6 5PD
GS281	3.64	Park	Local Park & Open Space	Public Access	SINC	Custom House & Canning Town	E16 3HD
GS282	0.42	Amenity / Play / Sports Pitch	Small Open Space	Public Access		Custom House & Canning Town	E16 1GD
GS283	2.05	City Farm	Local Park & Open Space	Public Access	SINC	Custom House & Canning Town	E16 3HR
GS284	0.52	Woodland	No Designation	No Public Access		Beckton	E6 5NY
GS285	0.04	Amenity	Pocket Park	Public Access		Custom House & Canning	E16 1LH

						Town	
GS286	0.20	Linear Open Space	Linear Open Space	Public Access	SINC	Custom House & Canning Town	E16 3HR
GS287	1.06	Woodland	No Designation	No Public Access		Beckton	E6 5NG
GS288	0.09	Estate Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 3NP
GS289	0.05	Estate Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 3EY
GS290	21.72	Park	District Park	Public Access	SINC, MOL	Beckton	E16 3RD
GS291	0.78	Education Land	No Designation	No Public Access		Custom House & Canning Town	E16 1LH
GS292	0.01	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 3NP
GS293	0.04	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 3EY
GS294	0.88	Education Land	No Designation	No Public Access		Custom House & Canning Town	E16 3ET
GS295	1.07	Allotment	No Designation	No Public Access		Beckton	E6 5NR
GS296	0.06	Amenity / Play	Pocket Park	Public Access		Beckton	E6 5ND
GS297	2.73	Park	Local Park & Open Space	Public Access		Custom House & Canning Town	E16 1LN
GS298	0.18	Railway Land	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 1DN
GS299	0.94	Woodland	No Designation	No Public Access		Beckton	E6 6FS
GS300	1.43	Park	Small Open Space	Public Access	SINC, LVRPA	Custom House & Canning Town	E14 0JG
GS301	6.74	Park	Local Park & Open Space	Public Access	MOL	Beckton	E6 5NA
GS302	0.06	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 1NE

GS303	0.19	Play / Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 1NE
GS304	1.01	Education Land	No Designation	No Public Access		Beckton	E6 5NA
GS305	0.29	Woodland	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 3ET
GS306	0.09	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 1LQ
GS307	1.62	Open Space	No Designation	No Public Access		Custom House & Canning Town	E16 3HJ
GS308	2.06	Education Land	No Designation	No Public Access		Custom House & Canning Town	E16 3HJ
GS309	2.07	Park	Local Park & Open Space	Public Access		Custom House & Canning Town	E16 3AU
GS310	0.08	Amenity	Pocket Park	Public Access		Beckton	E6 5PG
GS311	0.15	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 3QA
GS312	1.54	Allotment	No Designation	No Public Access		Custom House & Canning Town	E16 3RD
GS313	0.03	Woodland	No Designation	Public Access		Beckton	E6 5NP
GS314	0.54	Open Space	No Designation	No Public Access		Custom House & Canning Town	E16 3HJ
GS315	0.91	Linear Open Space	Linear Open Space	Public Access	SINC	Custom House & Canning Town	E16 2FQ
GS316	0.11	Allotment	No Designation	No Public Access		Custom House & Canning Town	E16 3HJ
GS317	0.81	Allotment	No Designation	No Public Access		Custom House & Canning Town	E16 3HJ
GS318	2.03	Woodland	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 3HJ
GS319	0.25	Railway Land	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 1DN
GS320	0.78	Allotment	No Designation	No Public		Custom House & Canning	E16 3HJ

				Access		Town	
GS321	0.07	Railway Land	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 3BY
GS322	0.04	Amenity	Pocket Park	Public Access		Beckton	E6 5NA
GS323	0.27	Railway Land	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 3BY
GS324	0.08	Railway Land	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 3BY
GS325	0.57	Amenity	Small Open Space	Public Access		Beckton	E6 6FY
GS326	3.18	Landscape Buffer	No Designation	No Public Access		Beckton	E16 2QU
GS327	0.18	Railway Land	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 1DN
GS328	0.31	Amenity	Pocket Park	Public Access		Custom House & Canning Town	E16 3BY
GS329	0.28	Railway Land	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 3BY
GS330	1.24	Linear Open Space	No Designation	No Public Access	SINC	Custom House & Canning Town	E14 0FP
GS331	0.23	Railway Land	No Designation	No Public Access	SINC	Custom House & Canning Town	E16 1DN
GS332	0.16	Landscape Buffer	No Designation	No Public Access	SINC	Custom House & Canning Town	E14 0FP
GS333	0.15	Railway Land	No Designation	No Public Access	SINC	Custom House & Canning Town	E14 0FP
GS334	0.58	Amenity	Small Open Space	Public Access		Royal Docks	E16 2AR
GS335	1.15	Linear Open Space	Linear Open Space	Public Access		Royal Docks	E16 2BE
GS337	0.06	Amenity / Play	Pocket Park	Public Access		Royal Docks	E16 2DZ
GS338	0.02	Amenity	Pocket Park	Public Access		Royal Docks	E16 2HL
GS339	0.03	Amenity	Pocket Park	Public Access		Royal Docks	E16 2DY
GS340	0.22	Amenity	Pocket Park	Public Access		Royal Docks	E16 2FY
GS341	0.46	Waterway	No Designation	No Public Access		Royal Docks	E16 2RG

## Abbreviations

AMR:	Authority Monitoring Report
AQMAs:	Air Quality Management Zones
BFL12:	Building For Life 12
BIM:	Building Information Modelling
BREEAM:	Building Research Establishment Environmental Assessment Method
CAA:	Civil Aviation Authority
CHP:	Combined Heat and Power
CIL:	Community Infrastructure Levy
CPO:	Compulsory Purchase Order
Defra:	Department for Environment, Food and Rural Affairs
DECC:	Department for Energy and Climate Change
DIF:	Development Infrastructure Funding
DLR:	Docklands Light Railway
DPD:	Development Plan Document
ELFT:	East London Foundation Trust
ELR:	Newham Employment Land Review
ELWA:	East London Waste Authority
FE:	Further Education
GDPO:	The (Town and Country Planning) General Permitted Development Order
GLA:	Greater London Authority
GTAA:	Gypsy and Traveller Accommodation Assessment
HMO:	House in Multiple Occupation
HSSA:	Housing Strategy Statistical Appendix
IDP:	Newham's Infrastructure Delivery Plan
IIA:	Integrated Impact Assessment
JSNA:	Joint Strategic Needs Assessment
LBN:	London Borough of Newham
LCY:	London City Airport
LCR:	London and Continental Railways
LIL:	Local Industrial Location
LIP:	Local Implementation Plan
LLDC:	London Legacy Development Corporation



LMUA: Local Mixed Use Area  
LDA: Local Development Agency  
LDC: Local Development Order  
LPA: Local Planning Authority  
LPD: Litres Per Day  
LPR: Local Plan Review  
MBOA: Micro Business Opportunity Area  
MMO: Marine Management Organization  
MOL: Metropolitan Open Land  
MUGAs: Multi-Use Play Areas  
NCCG: Newham Clinical Commissioning Group  
NCFE: Newham College of Further Education  
NPFA: National Playing Fields Association  
NPPF: National Planning Policy Framework  
OAPF: Opportunity Area Planning Framework  
ONS: Office of National Statistics  
PCT: Primary Care Trust  
PLA: Port of London Authority  
PPG: Planning Practice Guidance  
PRS: Private Rented Sector  
PSZ: Public Safety Zone  
PTAL: Public Transport Accessibility Level  
SAC: Special Area of Conservation  
SCC: Sustainability and Climate Change  
SFRA: Strategic Flood Risk Assessment  
SIL: Strategic Industrial Location  
SINC: Site of Importance for Nature Conservation  
SPD/SPG: Supplementary Planning Document/Guidance  
SoS: Secretary of State  
SuDS: Sustainable Urban Drainage System  
STOAs: Sustainable Travel Opportunity Areas  
TER: Target Emission Rate  
TfL: Transport for London  
TPO: Tree Preservation Order  
UEL: University of East London

## Glossary

**Affordable Housing:** Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or the subsidy to be recycled for alternative affordable provision.

**Affordable rented housing** is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

**Affordable Housing Off site Provision** is securing the provision of required affordable housing on a site separate to and outside of the development site.

**Affordable Housing Payment in Lieu** is a cash payment taken through planning obligations in lieu of direct provision of affordable housing on or off site. It can be used to purchase street properties to be used as affordable housing, fund building new affordable housing, make improvements to existing stock, or to bring vacant properties back into use.

**Agent of Change Principle:** Denotes that it is the responsibility of any new development (i.e. the agent of change) seeking to locate to an area, to mitigate any adverse impacts from any existing uses. This is to ensure that occupants of the new development are protected from adverse impacts and existing uses are protected from complaint. Similarly, any new development likely to generate adverse impacts (for example a music venue) would need under the principle, to put in place measures to mitigate impacts on any existing development close by.

**Archaeological Priority Areas (APA):** Defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. These areas are technical in nature and defined by Historic England.

**Arc of Opportunity:** The stretch of land from Stratford and the Olympic Park, down the Lower Lea Valley and east through the Royal Docks to Beckton (see Spatial Portrait Map). Historically a primarily industrial area, it has undergone much change in the economy after decades of public investment in land assembly, remediation, and infrastructure development, including under the auspice of the Olympic and Paralympic Games in 2012. Large scale transformational change is ongoing, contributing to the area becoming more mixed use and densely developed, or in effect, urbanising relative to what elsewhere in the borough increasingly seems suburban.

**Areas of Townscape Value (ATV):** An area of heritage value, with potential for designation as a Conservation Area, which the Council designates, protects and enhances.

**Blue Ribbon Network** is a spatial description for London's waterways and the waterside environments adjacent to them.

**Building Research Establishment Environmental Assessment Method (BREEAM):** A national standard for sustainable design and construction for new non-residential development. BREEAM

assesses the sustainability performance of developments, rating them 'Pass', 'Good', 'Very Good' or 'Excellent'. BREEAM includes nine sustainable design elements, including management, energy use, health and well-being, pollution, transport, land use, ecology, materials and water. BREEAM assessments must be undertaken by licensed and trained assessors.

**Car clubs:** Clubs where a number of people share a pool car(s) for rent or otherwise for personal use.

**Class B1:** Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.

**Cluster:** A concentration of interconnected businesses or uses that mainly relates to economic activities that support each other and benefits from scale economies.

**Co-location:** is a type of mixed use whereby the construction of industrial and warehousing floorspace and residential floorspace occurs on the same site, either horizontally (side by side) or vertically (residential uses on top of the industrial or warehousing).

**Community Facilities:** The Local Plan defines these as facilities for education (from pre-school to further and higher education) and training, health, social, leisure, places of worship, community (which could include pubs in some cases where other facilities are lacking), cultural and civic uses (including criminal justice and court facilities) and emergency services.

**Conservation Area:** An area with a special architectural and historic interest, buildings and streets which a local planning authority designates for its protection and enhancement and where specific planning controls apply.

**Conventional Housing:** Housing which falls into Use Class C3.

**Convergence:** The aim that in Newham and the other five Growth (formerly Host) boroughs – Greenwich, Tower Hamlets, Hackney, Barking and Dagenham and Waltham Forest – that within 20 years the communities who host the 2012 Games will have the same social and economic chances as their neighbours across London.

The Convergence Framework comprises three themes, each of which has specific objectives and action plans:

- Creating wealth and reducing poverty
- Supporting healthier lifestyles
- Developing successful neighbourhoods

**Critical Drainage Area:** An area within Flood Zone 1 which has critical drainage problems and which has been notified to the local planning authority by the Environment Agency.

**Crossrail 2 or Chelsea-Hackney Line** is intended to link north-east and south-west London. The precise route, the character and the role of the link have not yet been finalised.

**Cumulative Impact:** The combined impact of uses or activities that add up to something of greater significance (positive or negative) than when assessed on their own.

**District Centre:** Part of the Retail Hierarchy – see below

**Edge of centre:** Defined in the NPPF as ‘for retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.’

**Elizabeth Line, formerly Crossrail 1,** is an east-west rail line crossing central London between Paddington and Whitechapel serving Stratford, Canary Wharf and Heathrow Airport. It will serve major development and regeneration corridors and improve access to large areas of central and suburban London.

**Employment Hub:** Areas identified with significant amounts of employment-generating uses in growth sectors, recognising both locational and economic strengths and future expansion potential. As such they should be seen as important ‘areas of search’ for employment generating uses looking for new sites/premises.

**Employment Land:** Employment Land in Newham comprises Strategic Industrial Locations (SIL s), Local Industrial Locations (LILs), Local Mixed Use Areas (LMUAs) plus undesignated sites in industrial use of 0.1ha or more, or floorspace of 1000sq m or more, typically sites in predominantly B class or similar sui generis uses. Employment land is protected for its role in providing for existing and projected demand for employment and/or other functions important as part of the area’s industrial, utilities and logistics infrastructure and sustainable economic growth. This is however complemented by other sites with significant amounts of employment generating uses, notably town centres, the hospital and ExCel centre which are recognised as [the centre of] employment hubs.

**Enterprise Zone (EZ):** An Enterprise Zone provides business rate discounts and enhanced capital allowances for new businesses locating in the EZ and simplified local authority planning for new developments. It also enables any additional business rate income collected in the EZ to be retained and recycled locally for a period of 25 years. The Royal Docks Enterprise Zone became operational in 2013 to support local development and economic growth.

**Environmental Impact Assessment:** Defined in the NPPF as ‘a procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.’

**Equalities Impact Assessment (EqIA):** is a way of measuring the potential impact (positive or negative) that a policy, function or service may have on groups protected by equalities legislation, notably the Equalities Act 2010. This Act places a general duty on the council as a public body to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics. EqIA is therefore an essential tool for demonstrating the Council has complied with the law by shaping the way decisions are taken and thereby improving outcomes. It enables a good understanding of needs and differential impacts that Local Plan policies may have on different groups.

**Family Housing** houses or flats within Use Class C3 containing three or more bedrooms. This definition reflects the Council policy objective to retain a range of family sized accommodation, (including very large houses) and to prevent their subdivision into smaller units.

**Good Growth:** Growth (and development) that is socially, economically and environmentally sustainable, whereby growth:

- in housing numbers and population is balanced against that of the infrastructure and jobs needed to support it;
- is not at the expense of the environment / resources;
- does not result in compromises in quality; and
- is optimised in relation to strengths and opportunities, for the benefit of new and existing residents.

Good Growth forms the overarching Objective 3 of this Plan, and is established in policy by S1:1c.

**Green Corridors:** This refers to relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

**Greenfield Run-off:** The rate of run-off that would occur from the site in its undeveloped and undisturbed state.

**Green Infrastructure:** Open environment within urban areas, the urban fringe and the countryside. It is a network of connected, high quality, multifunctional open spaces, corridors and the links in between that provide multiple benefits for people and wildlife.

**Habitats Regulations Assessment (HRA)** is a requirement of the European Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the 'Habitats Directive'), implemented in the UK through the provisions of the Conservation of Habitats and Species Regulations 2010. An HRA assesses the impact of Local Plans on habitats and species of European significance. The HRA of the Newham Local Plan can be found on the Council's website, either within the Integrated Impact Assessment (IIA) or as an addendum.

**Health Impact Assessment (HIA):** is a systematic approach to predicting the magnitude and significance of the potential health and wellbeing impacts, both positive and negative, of new plans and projects. The approach ensures decision making at all levels considers the potential impacts of decisions on health and health inequalities. HIA is particularly concerned with the distribution of effects within a population, as different groups are likely to be affected in different ways, and therefore looks at how health and social inequalities might be reduced or widened by a proposed plan or project.

**Heritage Asset:** A building, monument, site, place, area or landscape positively identified as having a degree of significance as a component of the designated heritage assets (those buildings, monuments, structures, parks, etc. that are subject to national listing/scheduling, and those areas designated as Conservation Areas) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).

**High Speed 2:** Proposals are being developed for the construction of a new high speed railway between Euston and the north of England via Birmingham. It has been suggested that the line might extend to serve Stratford International; however this - as with other proposals including halting international trains at the station - is subject to the availability of line capacity and other matters including engineering. High Speed 1 domestic services already call at Stratford International Station.

**Inclusive Access:** Designed to remove barriers that create undue effort, separation or special treatment, and enables everyone to participate equally in mainstream activities independently, with choice and dignity.

**Incubator, Accelerators and Co-working spaces (IACs):** Types of workspace designed primarily for start-up, micro and small businesses. There are no universally accepted definitions for these different types of space and how they differ from other more conventional forms of business space.

**Integrated Impact Assessment (IIA):** addresses all of the Council's legal duties to carry out impact assessments of a Plan within one integrated process. It fulfils statutory requirements for the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and incorporates the requirements for Health Impact Assessment, Equalities Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA). Integrating the assessments in this way ensures a comprehensive approach that informs the development of plan policies. As many of the issues considered in the assessments overlap in practice, an integrated approach is thought to produce better recommendations and outcomes. The IIA is an iterative process that considers the impacts of emerging policies and proposes alterations to them or mitigation for any adverse impacts that may be identified. The IIA can be found on the Council's website.

**Intermediate housing** is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered, for planning purposes, as affordable housing.

**International Centre:** Part of the Retail Hierarchy – see below.

**Joint Waste Development Plan Document for the East London Waste Authority Boroughs (Joint Waste DPD):** This is a waste strategy produced jointly by the London Boroughs of Newham, Barking and Dagenham, Havering and Redbridge for the management of waste arising after they have been collected and sorted for recycling, recovery or disposal. The document provides lists of operational and proposed waste management sites; these are safeguarded in the Local Plan.

**Key Movement Corridor:** As defined in policy SP7, these corridors refer to arterial streets that form strategic linear gateways and offer the shortest way between main centres of activity. Due to their particular characteristics and alongside improvements to the public realm, they make an important contribution to people's perception of place by providing clear and identifiable linear connections where there is good to excellent access to sustainable modes of transportation (pedestrian, bicycle, bus, train); on-street parking controls (Residential Parking Zones and other on-street parking restrictions) and services as part of mixed, town centre uses.

**Large Houses in Multiple Occupation (HMO):** Shared houses or flats occupied by more than six unrelated individuals who share basic amenities.

**Listed Building:** A building of special architectural and historic interest, designated by Historic England.

**Local Centre:** Part of the Retail Hierarchy – see below.

**Local Industrial Locations (LILs, see J2 2a):** Locations of particular local importance for industrial (SIL conforming) uses, LILs form part of the Borough's reservoir of industrial sites to support economic growth.

**Local Mixed Use Areas (LMUAs):** Areas in which employment-led mixed use is promoted as part of the Managed Transition towards a genuinely mixed use borough through the protection of Class B1 and other employment-generating uses. Development should follow Managed Transition principles (see definition below) whilst securing environmental enhancements and compatibility with residential uses.

**Locally Listed Building:** A building designated by a local planning authority which does not meet the criteria for inclusion on the national list, but makes a positive contribution to the local scene or is valued for local historical associations.

**Local Shopping Parade:** Part of the Retail Hierarchy – see below.

**London Plan Apportionment:** The capacity requirement (in tonnes of waste) set by the London Plan, which must be accommodated through the safeguarding of sites for the ongoing operation or future development of waste management facilities. The list of Schedule 1 sites contained in the Joint Waste DPD is the list of existing, licensed operational waste treatment sites. The list of Schedule 2 sites in the DPD is of sites for safeguarding in the Local Plan.

**Major Centre:** Part of the Retail Hierarchy – see below.

**Major Development:** Defined by the London Plan as:

- for dwellings: where 10 or more are to be constructed (or if number not given, the area is more than 0.5 hectares); and
- all other uses: where the floorspace will be 1000 square metres or more (or the site area is 1 hectare or more). The site area is that directly involved in some aspect of the development. Floorspace is defined as the sum of floor area within the building measured externally to the external wall faces at each level. Basement car parks, roof top plant rooms, caretakers' flats etc. should be included in the floorspace figure.

**Managed Intensification:** is the [conditional] process of intensifying policy-compliant employment uses [floorspace plus yardspace] on identified areas of designated employment land [i.e. Strategic Industrial Locations and Local Industrial Locations], in accordance with the criteria in policy J2:3b, such that capacity is increased but the spatial footprint or spatial impact of employment land/industrial floorspace is reduced (ensuring no net loss of functionality), as part of a plan-led and managed approach to employment land that supports economic growth.

**Managed Release:** is the [conditional] process of releasing identified areas of designated employment land and/or industrial floorspace [including undesignated industrial sites of 0.1ha or more or operational floorspace of 1,000 sq m or more as per J2:2f] for redevelopment to other uses typically including residential, in accordance with the criteria in policy J2:3a, as part of a plan-led and managed approach to employment land that supports economic growth.

**Managed Transition:** is the [conditional] process of managing the spatial and temporal/process transition of identified areas of designated employment land [i.e. Local Mixed Use Areas] to 'lighter' employment generating uses (often from more traditional heavier industries) that are more



compatible with residential development, in accordance with the criteria in policy J2:3a, as part of creating a mixed use borough and the securing of employment land that is better aligned with contemporary business needs.

**Materials Recovery Facility:** A facility for sorting waste collected from households and businesses into recycling streams for distribution for further processing. The London Plan ultimately aims to manage and recycle all waste streams at locations within the Greater London area.

**Meanwhile use:** Temporary use that helps bridge the gap between a site's present condition and the vision for it as part of the wider area, ensuring it is activated and helping bring forward the likelihood of more permanent development.

**Metropolitan Centre:** Part of the Retail Hierarchy - see below.

**Metropolitan Open Land (MOL):** Strategic open land within the urban area that contributes to the structure of London.

**Micro Business Opportunity Areas (MBOAs):** Areas considered to have potential to provide for incubator and micro business space.

**Micro Enterprises:** A small business employing ten or fewer people.

**On street cycle parking:** This normally comprises evenly spaced small groups of 'Sheffield' type stands placed within the highway or in other public spaces.

**Planning Obligations** are a private agreement, usually negotiated in the context of a planning application, between a local authority and persons with an interest in the land. Planning obligations are currently negotiated under Section 106 of the Town and Country Planning Act 1990, as substituted by Section 12 of the Planning and Compensation Act 1991.

**Primary Shopping Area:** Defined by the NPPF as 'an area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage)'.

**Primary Shopping Frontage:** Defined in the NPPF as 'likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods.'

**Quality leisure:** Leisure uses for the benefit of the community which fall under Use Class D2, A3 or A4.

**Resilience:** Encapsulates the Mayor of Newham's approach to addressing the multiple challenges of being the second most deprived borough in the UK. It is about possessing a set of skills and having access to the resources that allow us to negotiate the challenges that we all experience and also that allow people to overcome the more difficult circumstances many of Newham and other boroughs' residents experience and to take up opportunities that come our way.

**Retail Hierarchy:** An interrelated network and hierarchy of retail and associated service provision. In Newham, broadly as per the London Plan definitions, this comprises:

- Town Centres: Defined area which may be a successful economic places or destinations in their own right containing town centre uses. This is a collective term for:
  - International Centre, defined as: London's globally renowned retail destinations with a wide range of high-order comparison and specialist shopping with excellent levels of public transport accessibility
  - Metropolitan Centre (Stratford), defined as: serving wide catchments which can extend over several boroughs and into parts of the wider South East region. Typically they contain at least 100,000 sq.m of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions.
  - Major Centre (East Ham), defined as: typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sq.m of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.
  - District Centre (Canning Town, Forest Gate, Green Street and East Beckton), defined as: providing convenience goods and services for more local communities and accessible by public transport, walking and cycling; typically containing 10,000 – 50,000 sq.m of retail, leisure and service floorspace; with potential for specialist shopping functions in some cases.
- Local Centres, defined as: typically serving a localised catchment often most accessible by walking and cycling, and comprise mostly convenience retail (including potentially a small supermarket of around 500 sq m) and other services. In Newham they average 4650 sq m.
- Local Shopping Parades: Small groups of shops (three or more units).

**Ribbon Developments** are long rows of buildings along main roads.

**Scheme Viability:** Economic viability of a scheme taking into account all development costs and profit, ultimately determining whether a scheme comes forward. (HCA definition: a viable development will support a residual land value at a level sufficiently above the sites existing use value (EUV) or alternative use value (AUV) to support a land acquisition price acceptable to the landowner).

**Secondary Shopping Frontage:** Defined by the NPPF as 'providing greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.'

**Section 106 Agreements** place planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.

**Secure, Covered Cycle Parking:** This normally incorporates security features such as individual cycle lockers, cycle cages with lockable gates, card-access cycle stands, CCTV, cycle repair workshops, and so on, depending on the location.

**Shared Equity** is where more than one party has an interest in the value of the home, e.g. an equity loan arrangement or a shared ownership lease. There may be a charge on the loan, and restrictions on price, access and resale.

**Shared Ownership** is a form of shared equity under which the purchaser buys an initial share in a home from a housing provider, who retains the remainder and may charge a rent. The purchaser may buy additional shares ('staircasing'), and this payment should be 'recycled' for more affordable housing. In most cases, a purchaser may buy the final share ('staircase out') and own the whole home.

**Small and Medium Enterprise (SME):** Business with more than 10 and fewer than 250 employees.

**Social Enterprises:** Specific forms of enterprise which reinvest all profits into the business or community rather than being driven to maximise profits for stakeholders or owners. They have primarily social or environmental objectives; but to achieve their purposes by operating commercially. If a Social Enterprise has fewer than five employees it can also be a micro enterprise.

**Social housing:** A collective term for affordable housing delivered within a scheme as either social rented or affordable rented housing, or a combination of the two products.

**Social rented housing** is owned by local authorities and private registered providers\*, for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

\*As defined in S80 of the Housing and Regeneration Act 2008.

**Specialised/Specialist Housing:** Housing which meets the specialised housing needs of groups such as older and disabled people (Policy H3).

**Strategic Flood Risk Assessment (SFRA):** Framework for the consideration of flood risk when making planning decisions. The SFRA is a requirement of the NPPF and enables a sequential risk based approach to be applied to decision making at all levels of the planning process. Newham's SFRA was published in September 2017 and can be found on the Council's website.

**Strategic Industrial Location (SIL):** The London Plan (2016) defines these, and they exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation) utilities, wholesale markets and some transport functions.

**Subsidy** means monetary assistance granted by the government to support the construction of affordable housing.

**Sui Generis:** Land use that does not fall under the Use Class categories as defined in the Town and Country Planning (Use Classes) (Amendment) (England) Order 2015 or any subsequent amendment.

**Sustainability Appraisals (SAs)** assess the likely environmental, economic and social impact of plans and integrate sustainable development considerations into the plan-making process. SAs are a

requirement of the Planning and Compulsory Purchase Act (2004) and Strategic Environmental Assessments (SEA) are required by European Directive EC/2001/42, which was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes (July 2004). Government guidance 'A Practical Guide to the SEA Directive (ODPM 2005), and the 'National Planning Policy Framework (NPPF) 2012' and Planning Practice Guidance (PPG) have merged this process to allow for a single joint appraisal (SA/SEA) to be carried out. In Newham, the SA forms part of the Integrated Impact Assessment (see definition above).

**Sustainable Urban Drainage Systems (SuDS):** Sequence of water management practices and facilities designed to drain surface water in a manner that will provide a more sustainable approach than the conventional practice of routing run-off through a pipe to a watercourse.

**Tenure:** The legal and financial arrangements under which someone has the right to live in a house or flat, for example private ownership, affordable rent, shared ownership, intermediate rent or private rent.

**Town Centre:** Part of the Retail Hierarchy – see above.

**Town Centre Uses:** Defined in the Local Plan and reflecting the 'Main town Centre uses' definition of the NPPF as: Retail, including warehouse clubs outlets leisure entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-throughs, bars, pubs and clubs, casinos, health and fitness centres, bowling and bingo), offices, arts, culture and tourism (including theatres, museums, galleries and concert halls, hotels and conference facilities) and community facilities (including colleges, health care facilities, libraries, contact centres, places of worship and community centres).

**Unit:** Distinct part of a building or land used solely for one specific purpose. For the interpretation of policy SP9, a unit relates to a single frontage unit in accordance to street naming and numbering.

**Urban Newham:** The areas located outside the Arc of Opportunity. See also Web of Opportunity definition below.

**Utilities Infrastructure:** Provision for the delivery of electricity, gas, telecommunications and water for public use. Decentralised energy networks and localised energy generation methods are also regarded to be a form of utilities infrastructure.

**Web of Opportunity:** is the stretch of land outside of the Arc of Opportunity, also known in the Local Plan as Urban Newham. The Web is a concept used to describe the potential cumulative benefits derived from development of Strategic Sites in this area, wider town centre growth in part stimulated by Crossrail investment, and other smaller scale opportunities, leading to important transformational change in the more historic neighbourhoods of Newham and wider impetus for investment and regeneration.

## Appendix 4 – Comparing the previous and new Local Plans

How policies within the previous Core Strategy (2012) and Detailed Sites & Policies DPD (2016) have transposed into the new plan is illustrated below; Core Strategy policies are shown in pink, Detailed Sites and Policies DPD policies in blue.

Introduction		
Newham Today (intro, spatial portrait, challenges and opportunities, context)	→	Introduction (inc. spatial portrait, SWOT analysis, overarching plan objectives, key diagram)
Newham 2027 (our vision for Newham)	→	Vision is now embedded within spatial policies
Spatial Policies		
S1, S2, S3, S4, S5 & S6		As before, with vision now embedded within these policies
Successful Places		
SP1, SP2, SP3, SP4, SP6, SP7 & SP8	→	As before
SP5 Heritage and other Successful Place-making Assets	→	SP5 Heritage and other Successful Place-making Assets
SP5a Areas of Townscape Value and Archeological Priority Areas	→	SP9 Cumulative Impact
SP9 Recognising Cumulative Impact	→	
SP10 Managing Cumulative Impact	→	
Jobs, Business and Skills		
J3 Skills and Access to Employment	→	As before
J1 Investment in the New Economy	→	J1 Business and Jobs Growth
J2 Providing for Efficient Use of Employment Land	→	J2 Providing for Efficient Use of Employment Land
J4 Managing a Mixed Use Borough	→	
Homes		
H2 Affordable Housing	→	As before
H1 Building Sustainable Mixed Communities	→	H1 Building Sustainable Mixed Communities
H4 Protecting and Re-Shaping the Existing Housing Stock	→	H4 Protecting and Re-Shaping the Existing Housing Stock
H3 Specialist Accommodation Needs	→	H3 Specialist Accommodation Needs
H5 Achieving Housing Mix	→	
H6 Achieving High Quality Accommodation	→	
H7 Distribution of Specialist Accommodation	→	

## Sustainability & Climate Change

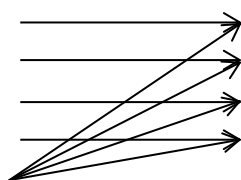
**SC1** Climate Change

**SC2** Energy

**SC3** Flood Risk

**SC4** Biodiversity

**SC5** Maximising Sustainable Design



**SC1** Environmental Resilience

**SC2** Energy & Zero Carbon

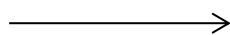
**SC3** Flood Risk & Drainage

**SC4** Biodiversity

**SC5** Air Quality

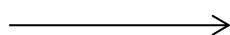
## Infrastructure

**INF1, INF2, INF3 & INF9**



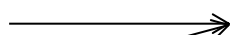
As before

**INF4** Local Heat and Power Networks



**INF4** Utilities Infrastructure

**INF5** Town Centre Hierarchy and Network



**INF5** Town Centre Hierarchy and Network

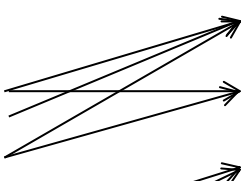
**INF5a** Local Shopping Parades



**INF6** Green Infrastructure

**INF6a** Protected Green Infrastructure

**INF7** Blue Ribbon Network



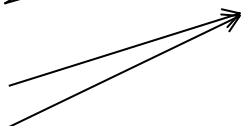
**INF6** Green Infrastructure & the Blue Ribbon Network

**INF7** Open Space and Outdoor Recreation

**INF8** Community Facilities

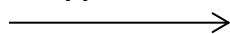
**INF8** Community Facilities

**INF10** Locating Community Facilities



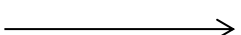
## Appendices

**Appendix 1:** Strategic Site Schedule and Designations



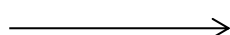
**Appendix 1:** Sites Schedule - Strategic Sites

**Appendix 2:** Housing Allocations



**Appendix 2:** Non-Strategic Residential Site Allocations

**Appendix 5:** Protected Green Infrastructure



**Appendix 3:** Protected Green Infrastructure

**Appendix 3:** Infrastructure Delivery Plan



Infrastructure Delivery Plan (separate document)

**Appendix 4:** Monitoring Framework



New section under all policies

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# **Report to the London Borough of Newham Council**

**by Mike Fox BA (Hons) Dip TP MRTPI**

**an Inspector appointed by the Secretary of State**

**Date: 26 November 2018**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the Newham Local Plan Review**

The Plan was submitted for examination on 27 February 2018

The examination hearings were held between 19 and 28 June 2018

File Ref: PINS/G5750/429/10



## Abbreviations used in this report

AA	Appropriate Assessment
ABP	Advanced Business Park
AH	Affordable Housing
ALP	Adopted London Plan (2016)
B1	Business Use Class
B2	Industrial Use Class (other than falling within Class B1)
B3	Special Industrial (Group A) Use Class
BREEAM	Building Research Established Environmental Assessment Method – for assessing, rating and certifying the sustainability of buildings
CJEU	Court of Justice of the European Union
DLP	Draft London Plan – Draft for Public Consultation; December 2017
DLR	Docklands Light Railway
DTC	Duty to Co-operate
dpa	dwellings per annum
DPD	Development Plan Document
FOI	Freedom of Information
GI	Green Infrastructure
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
IIA	Integrated Impact Assessment
LBN	London Borough of Newham
LIL	Local Industrial Location
LIP	Local Implementation Plan
LMUA	Local Mixed Use Area
MHCLG	Ministry of Housing, Communities and Local Government
MM	Main Modification
MOL	Metropolitan Open Land
NE	Natural England
OAN	Objectively assessed need
ONEL	Outer North-East London
PLA	Port of London Authority
PDL	Previously developed land (also known as brownfield land)
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PTAL	Public Transport Accessibility Level
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCG	Statement of Common Ground
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SIE	Standard Industrial Estate, North Woolwich
SIL	Strategic Industrial Location
sq m	square metre
STW	Sewage Treatment Works
<i>The Framework</i>	National Planning Policy Framework (or NPPF)
TfL	Transport for London
TW	Thames Water

## Non-Technical Summary

This report concludes that the Newham Local Plan Review provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. Newham London Borough Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the Examination Hearings. Following the Hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

<b>Summary of Main Modification(s)</b>
A commitment to and setting the parameters for an <b>early review of the Plan</b> .
Setting out the requirements for and details of <b>masterplans</b> for Strategic Sites and any other major unallocated sites.
Clarifying <b>living conditions</b> considerations.
Clarifying accommodation for non - nomadic <b>gypsy and traveller population</b> .
Clarifying <b>infrastructure</b> future requirements and commitments for masterplanning.
Clarifying <b>employment policies</b> , including employment-led development; and marketing industrial sites.
Clarifying, promoting and setting the parameters for an ' <b>Agent of Change</b> ' approach to new development and defining other key principles at the heart of the Plan's strategy.
Ensuring adequate avoidance and reduction measures are taken to ensure that adverse effects on the <b>integrity of European sites</b> (notably Epping Forest SAC) are excluded, with reference to the recent CJEU Sweetman Judgment <sup>1</sup>
Addressing <b>other biodiversity issues</b> , including improving the quality of waterbodies in the Thames River Basin; and delivering biodiversity net gain.
<b>Local Green Space deletion</b> at Beckton Sewage Treatment Works (STW).
Reinforcing <b>protection of listed buildings</b> and their settings.
Clarifying the requirements and setting the parameters for <b>retail impact assessments</b> on out-of-centre retail or other town centre uses over 300 sq m net (sales floorspace); providing more detail on the quantum of major retail development proposals and clarifying the retail hierarchy; and clarifying parameters for avoiding over-concentrations of specific uses in town centres.
Clarifying the <b>tall buildings</b> policy and increasing the indicative permitted building heights at a number of strategic locations and reducing it in one case to reflect heritage sensitivities.
Including a stepped <b>housing trajectory</b> , for each five year phase of the Plan.
Clarifying several <b>energy</b> policies.
Clarifying <b>water and waste water</b> policies, including water efficiency requirements; requiring major development proposals to be accompanied by Waste Management Plans; ensuring appropriate mitigation for development in the vicinity of Beckton STW; and setting out the parameters for aligning occupation of new dwellings with the delivery of the necessary infrastructure upgrades.

<sup>1</sup> Court of Justice of the European Union (CJEU) in People over Wind, Peter Sweetman v Coillte Teoranta (Case C-323/17); 12 April 2018.

## Introduction

1. This report contains my assessment of the Newham Local Plan Review in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The revised National Planning Policy Framework was published in July 2018. It includes a transitional arrangement in paragraph 214 whereby, for the purposes of examining this Plan, the policies in the 2012 *Framework* will apply. Unless stated otherwise, references in this report are to the 2012 *Framework*.
3. The starting point for the Examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The London Borough of Newham – Local Plan Review, submitted in February 2018, is the basis for my Examination. It is the same document as was published for consultation in November 2017, except for the addition of some amendments which were included in response to a number of comments made by consultees.
4. At the start of the Examination Hearings the Council issued a further version, again including amendments based on comments from consultees and in response to my Matters, Issues and Questions Discussion Note<sup>2</sup>. Although this version is not the submitted Plan, it provides a helpful understanding of the Council's response in relation to a number of issues, and some of the proposed modifications in that document have become MMs in this report. All these documents have been made available on the Council's website since the date of their publication and I am not aware of any issues or concerns raised by this process.

## Main Modifications

5. In accordance with section 20(7C) of the 2004 Act, the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the Examination Hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc., and are set out in full in the Appendix.
6. Following the Examination Hearing sessions, the Council prepared a schedule of proposed MMs. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as

<sup>2</sup> Inspector's Matters, Issues and Questions Discussion Note; April 2018.

published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken.

## **Policies Map**

7. The Council is required to maintain an adopted Policies Map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission Policies Map showing the changes to the adopted Policies Map that would result from the proposals in the submitted local plan. In this case, the submission Policies Map comprises the set of plans identified as Local Plan Review-Policies Map Changes, dated February 2018 as set out in Examination Document Reference SD02B.
8. The Policies Map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the Policies Map.
9. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted Policies Map to reflect the changes set out in Document SD02B and the further changes published alongside the MMs.

## **Assessment of Duty to Co-operate**

10. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
11. The Council's Duty to Co-Operate (DTC) Statement<sup>3</sup> produces detailed evidence showing extensive and continual engagement with its seven neighbouring authorities, the Mayor of London and Greater London Authority/Transport for London (TfL) and other institutions, bodies and strategic providers throughout the local plan process. Several bodies expressed support for the Plan and none queried the Council's handling of the Plan consultation process or its cooperation regarding strategic and cross-boundary issues.
12. The Council also pointed to a number of specific outcomes of the DTC process. These include working on cross-boundary connections and parkland provision in the Lower Lea Valley; agreeing a 'large site' housing capacity figure with the Greater London Authority (GLA) as input to the Borough's housing requirement; agreeing a joint demand-side evidence base in relation to employment land and Strategic Industrial Land (SIL) release quantum with GLA; agreeing an approach to wharf consolidation with GLA and Port of London Authority (PLA); agreed continuation of the management of Stratford town centre; and joint infrastructure/investment planning under the auspices of the joint GLA/Council Royal Docks Team.
13. On the basis of these considerations, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis with all relevant strategic and neighbouring authorities, organisations and bodies in

<sup>3</sup> LBN: Duty to Co-operate Statement [Examination Document SD08].

the preparation of the Plan and that the Duty to Co-operate has therefore been met.

## Assessment of Soundness

### Main Issues

14. Taking account of all the representations, the written evidence and the discussions that took place at the Examination Hearings, I have identified seven main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

### **Issue 1 – Is the Plan, including its overall vision and spatial strategy for the period up to 2033, in general conformity with the Adopted London Plan (ALP) and national planning policy?**

#### *Scope of the Plan*

15. The scope of the Plan is encapsulated in policy S1, which sets out five strategic principles for the planning of the Borough over the plan period (2018-2033), which in essence are:
- Securing transformational change for the Borough and its residents;
  - Realising the potential and making the best use of Newham's land, green space and blue ribbon network, and in particular to enable delivery of 43,000 homes and 60,000 jobs;
  - Promoting 'good growth' involving higher density, mixed use and context sensitive development;
  - Keeping Newham moving through promoting sustainable transport and improved access and connectivity; and
  - Enabling Newham to become cleaner and greener and more sustainable.
16. Policy S1 is supported by policies S2 to S6 (comprising spatial policies for each of the main areas of the Borough). Together, they show that the strategy of the Plan accords with the current adopted London Plan (ALP)<sup>4</sup>. In particular, the Plan encompasses strategic policies for the protection of Strategic Industrial Locations (SIL); selectively consolidating safeguarded wharves along the River Thames, freeing up parts of the river frontages for further mixed use development at Lyle Park West and Thames Wharf; setting out an ambitious housing target; and promoting sustainable transport and sufficient infrastructure capacity to enable the effective implementation of the Plan.
17. The Plan proposes several Strategic Sites to enable the delivery of the key areas of development and change in the Borough. The changes to policy S1.3.b and its supporting text **[MM11 - 13]**, clarify the expectations of the masterplanning of these Strategic Sites in order for the Plan to be positively prepared and effective. These changes are required to ensure that these Strategic Sites refer to the need for neighbourliness and successful integration

<sup>4</sup> The adopted London Plan (ALP); March 2016.

with the wider public area; setting a framework for an appropriate mix of house types and tenures; delivering key strategic links; accommodating tall buildings; and securing appropriate and proportionate developer contributions, especially regarding infrastructure provision. This also reflects the PPG's requirements to make clear what is intended to happen in the area, where and when this will occur and how it will be delivered<sup>5</sup>.

18. The GLA's written response<sup>6</sup> considers that the Plan is in general conformity with the ALP, although some detailed comments are made which this report addresses below. From the evidence I have read and heard, I agree with the GLA's response.

#### *Relationship to the emerging Draft London Plan (DLP)*

19. The emerging Draft London Plan (DLP)<sup>7</sup> was published in December 2017 for public consultation. It is clear, from the Council's uncontested evidence, that it has collaborated extensively with the GLA over the preparation of the DLP and in many aspects there is a high degree of continuity between the ALP and the DLP. Some of the key changes of direction between the two London Plans, such as Good Growth, Agent of Change and Managed Intensification, are terms which the Plan needs to define or redefine to remove any uncertainty **[MM44-53]**, to ensure its effectiveness and positive preparation.
20. A key area of divergence between the DLP and this Plan concerns total housing provision over the plan period (to 2033). The required rate of housing provision for Newham has risen between the two London Plans from at least 1,994 dwellings per annum (dpa) in the ALP to 3,850 dpa in the DLP, which almost doubles the rate of Newham's housing provision since 2016. Hence, the DLP ten year housing target of 38,500 over the period 2019/20 to 2028/29 is equivalent to around 57,750 dwellings over the equivalent 15 year period of this Plan. The Plan requirement of 2,867 dpa for Newham (albeit with planned delivery through a stepped trajectory over the plan period, see paragraph 112-115) represents a gap of close on one thousand dpa, or 25.5% below the housing target in the DLP.
21. Concerns were expressed that the Plan could do more to respond to the acknowledged 'housing crisis' in London, and respond more closely to paragraph 47 of *the Framework*<sup>8</sup>, to boost significantly the supply of housing. It was therefore argued that the Plan's housing provision should increase significantly in line with the DLP. The Plan, however, exceeds the housing provision in the ALP by a significant margin, in line with paragraph 47 of *the Framework*, and general conformity does not equal "exactly the same as".
22. The Examination of the DLP is at a relatively early stage in its preparation, and clearly changes may be made during its Examination. Although I acknowledge the disparity in housing targets between the two Plans, the figures in the DLP are as yet untested through the scrutiny of examination, and for these reasons limits the weight it can be given in this Examination.

<sup>5</sup> PPG Ref ID:12-002-20140306: What should a local plan contain?

<sup>6</sup> GLA Response to Newham Local Plan Review; 16 January 2018 [Examination Representation Ref 20].

<sup>7</sup> The London Plan: Consultation Draft (DLP); December 2017.

<sup>8</sup> DCLG National Planning Policy Framework (*the Framework*); March 2012.

23. I deal with housing in greater detail below (Issue 5). On the basis of the considerations outlined above, I consider that the targets set out in the DLP should not be the figures to which this Plan needs to broadly conform. The ALP remains the strategic plan for the testing of the housing policies in this Plan. There is no suggestion from the GLA that the figures in the DLP should be used against which general conformity of this Plan should be judged.
24. The Council accepts that the DLP, once adopted, will set the strategic housing target for Newham. In the light of this, provision needs to be made for an early review of the Plan, focused on housing provision. **MM10** which commits the Council to an early review of the Plan is therefore necessary, ensuring that the Plan is consistent with national policy, effective and is positively prepared.

#### *Relationship with Neighbourhood Planning*

25. It is important that the relationship between the Plan and any neighbourhood plans is clearly understood, so as to prevent duplication, minimise potential conflict and cut out unnecessary expenditure, and the Plan addresses this.

#### *Issue 1 - Conclusion*

26. Subject to the above modifications, I conclude that in the Plan, including its overall vision and spatial strategy for the period up to 2033, is in general conformity with the ALP and national planning policy.

#### **Issue 2 – Is the spatial strategy of the Plan supported by the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)?**

27. The spatial strategy of the Plan builds on the Newham Core Strategy (2012), which itself was fully supported by both a Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA), including maintaining the Borough's transformative regeneration momentum; pushing for higher density development through the application of the 'Good Growth' principle and ensuring that the spatial strategy is embedded in policy; and continuing to reinforce the 'Arc of Opportunity' as the focus of the majority of strategic growth in the Borough.
28. The Council has tested the Plan against an extensive and robust Integrated Impact Assessment (IIA)<sup>9</sup>, which incorporates the SA and HRA. The IIA identified 13 objectives against which draft policies and site allocations were assessed. It identifies no unacceptable impacts; this is reflected in the near absence of representations critical of either the SA or HRA. From the evidence submitted, I consider that the Plan does not generate any unacceptable environmental impacts within or beyond the boundary of the Borough.
29. A key representation in support of a fuller HRA came from Natural England (NE), together with the need for further consideration in the light of two recent judgments – the Wealden Judgment in the High Court and the Sweetman 2 Judgment in the European Court of Justice (CJEU). A number of changes to the Plan [**MM16-18; 21; 24; and 32-34**] ensure that it is consistent with national policy and the requirements of the CJEU. In brief, these modifications increase the means of protection for Epping Forest Special Area of Conservation (SAC), including the requirement of considering both direct and

<sup>9</sup> Examination Document SD04; dated February 2018.



indirect impacts, increased joint working by relevant local planning authorities and agencies such as NE, and a renewed emphasis on monitoring air quality and recreational disturbance on the Epping Forest SAC.

30. The SCG between the Council and NE<sup>10</sup> makes clear that the HRA and the Plan as a whole, incorporating the above MMs, satisfies the relevant legal requirements in relation to Local Plan preparation, whilst noting an ongoing intention during implementation to investigate further in-combination and cumulative effects of development on Epping Forest SAC.
31. The amended HRA, prepared in consultation with NE, concludes that potential negative effects of increased population and growth in car and freight traffic on the Epping Forest SAC are in fact largely pre-empted and prevented by the already existing spatial pattern of development and commuting and freight movements, and distribution of planned growth. It therefore concludes that an Appropriate Assessment (AA) is not necessary<sup>11</sup>, a view with which I concur.

### *Issue 2 - Conclusion*

32. Based on the above considerations, I conclude that the spatial strategy of the Plan is supported by the SA and HRA. Furthermore, all reasonable alternatives have been considered by the Plan through the SA, and that, subject to the above modifications, the Plan is justified and satisfies the relevant legal requirements.

### **Issue 3 – Are the Successful Places policies (SP1-6) justified and effective to meet existing challenges and those which could arise from the likely intensification of development in Newham over the plan period?**

33. Policies SP1-6 aim to secure high quality development across Newham for all sections of the Borough's population. They are concerned with place making, securing healthy neighbourhoods, improving urban design, setting a strategic context for tall buildings, safeguarding heritage, providing a framework for successful town and local centres and ensuring neighbourly development.
34. One of the key challenges facing Newham is the prospect of continuing intensification of development; this has implications for the densities and heights of buildings and the most effective ways to harness benefits from developments whilst safeguarding its heritage assets and living conditions for existing and future residents.

### *Tall Buildings*

35. Policy SP4 establishes the parameters for tall buildings across the Borough. It is informed by the Council's Tall Buildings Study<sup>12</sup>, which states that it is both necessary and useful to define what is considered to be a tall building within the Newham context. The policy attracted a mixed response; some advocated increasing the spread and heights of tall buildings across the Borough, whilst others drew attention to the harmful impact of tall buildings on residents' living conditions or on heritage assets and their settings.

<sup>10</sup> SCG between LBN and NE Concerning Habitat Regulations Assessment of the Local Plan; June 2018.

<sup>11</sup> Revised Appendix 6 Final HRA, paragraph 6.1.2 [No examination Document number].

<sup>12</sup> LBN: Local Plan Evidence Base-Tall Buildings Study; February 2018 [Examination Document EB09].

36. Five principal soundness issues were raised during the Examination, and I deal with each in turn.

*(i) Quality of the Evidence Base*

37. Concern was expressed that policy SP4 has a poor evidence base with little or no justification for the 6 storey definition of a tall building or for the limited areas (both in number and in geographic extent) where significantly higher structures would be acceptable in principle. In the light of the GLA's comments<sup>13</sup>, that 5-8 storeys should not qualify as tall buildings, it was argued that the policy should match the London Plan for consistency.
38. The Tall Buildings Study establishes indicative appropriate heights for tall buildings at existing and proposed Strategic Sites in the Borough. The Study recognises that there are clear benefits deriving from tall buildings in some areas as well as a potential adverse environmental impact, where tall buildings would be out of character with the urban grain. I consider that the principles set out in the Study are justified in the Newham context.
39. The ALP strategy limits tall buildings to areas such as town centres with good access to public transport. In line with the ALP and Historic England, the Tall Buildings Study states that tall buildings in appropriate locations must not adversely affect local character, including the settings of heritage assets, by reason of scale, mass or bulk. These principal criteria have fed into policy SP4.
40. I find that the quality of the evidence base for tall buildings in policy SP4 is both justified and accords with the ALP. The concept of limiting the spread of tall buildings to certain defined areas is also appropriate for Newham, which is generally characterised by large areas of low rise two-storey housing within a predominantly flat landscape.

*(ii) Is policy SP4 too prescriptive?*

41. Concerns were expressed that policy SP4 is too prescriptive in its maximum permitted height of tall buildings, on the grounds that it stifles both creativity and maximising key development opportunities for the Borough. It was argued that tall buildings should be planned in the context of carefully considered masterplans, and that building higher is the route to responding satisfactorily to the challenges of new development (especially housing) which Newham is expected to take on board with the increased housing numbers contained in the DLP.
42. Reference was made to ALP policy 7.7, which defines tall buildings as "*those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor*", and that ALP policy does not define tall buildings by reference to a height or number of storeys. It was also contended that if a height limit is still considered appropriate, then this should be raised, perhaps in the region of 8-12 storeys.

<sup>13</sup> GLA Response to Proposed Submission Draft (Regulation 19) Consultation; 16 January 2018 [Representor Ref 20].

43. However, "freeing up" the indicative height requirements in policy SP4 would mean that many proposals for tall buildings, especially within the 'Arc of Opportunity', would fail to qualify as tall buildings given the prevailing character of some parts of the Borough, and some tall building proposals would fall outside the remit of the policy altogether. A numerical definition (i.e. the number of storeys) removes the element of doubt, whilst still allowing for a full consideration of character in all cases. Whilst DLP policy D8 can only be afforded limited weight, it advises that development plans should define what is considered a tall building, whilst accepting that the height may vary in different parts of London. Therefore the Plan would not be out of step with the ethos of DLP policy D8 in relation to this matter.
44. For the above reasons, I support the principle of including indicative building heights in the policy, expressed through a number of storeys, as appropriate for providing a robust framework for the development of tall buildings in Newham. The Plan's indicative level of six storeys (or more) was not robustly challenged, and I see no detailed evidence to point to a different figure, whilst the strategic parameters are appropriate for large areas within the Borough, and the nuanced and comprehensive nature of policy SP4 is appropriate for these areas.

*(iii) Should more areas be identified for tall buildings on the Policy Map?*

45. Relatively few areas are identified on the Policies Map as suitable for the development of tall buildings, with 20 plus storeys only permitted in part of Stratford town centre and Canning Town tallest buildings area.
46. Some Strategic Sites in the Borough have undergone and are continuing to undergo successful transformation and contribute positively to the Council's regeneration strategy. There is some scope for revisiting the height restrictions as included in the Plan, to reflect both the changing character of some locations where the public transport accessibility level (PTAL) is excellent (4 or above), or where firm plans are in place to bring the PTAL up to this level. The linking of policy SP4 to good public transport access is clearly justified on sustainability grounds.
47. Regarding the Royal Docks, there are sites outside the London City Airport Safeguarding Area where there is no physical reason why the indicative heights level could not be exceeded. However, the PTAL is relatively low and the current capacity on the existing Docklands Light Railway (DLR) lines that serve this area is limited. I consider that gateway status is insufficient justification on its own to bring about a significant policy change on tall buildings, notably indicative heights of greater than 20 storeys.
48. However, within the Strategic Sites at Thames Wharf (S08), Silvertown Landing (S09), Lyle Park West (S20) and Minoco Wharf (S22), the PTAL scores are higher than those further east or closer to the Docks, with the prospect of further improvements through new stations and overall better access arrangements due to station proximity and connections to other stations/services. Consequently, within these areas, there is scope and justification to increase the indicative heights of tall buildings on these sites, but not those elsewhere in the area where heritage considerations are also more significant.

49. As it stands, the restriction of building heights in these Strategic Sites is unjustified, as it fails to reflect their role and function as key regeneration sites in accessible locations, contrary to both *the Framework's* core planning principles outlined in paragraph 17 (especially supporting sustainable economic development; encouraging the effective use of land; promoting mixed use developments; and making the fullest possible use of public transport) and the need to respond effectively to the demographic and economic needs of London.
50. To this end **MM 36, 37, 42 & 55** increase the indicative building heights to 10-12 storeys and up to 18 storeys at key locations within these four Strategic Sites. The provision for even higher buildings generally reflects their very accessible locations in relation to public transport provision.
51. Within parts of Beckton Riverside, Strategic Site (S01), the Gallions Reach area, subject to the designation of a new town centre and proximity to a new DLR station, an indicative height is already set at up to 19 storeys. I have no reason to come to a different view here. The current PTAL score for Beckton Riverside is 3, and additional DLR capacity further into the plan period may provide an increased PTAL to enable taller buildings to be developed at key locations. In addition, in the Albert Basin Strategic Site (S19), in the vicinity of Gallions Reach DLR station, an indicative height is set for 6 to 8 storeys and up to 13 storeys at key locations, and the arguments for these heights are justified for the reasons I have stated in paragraphs 48-50 above.
52. The Strategic Site at Woodgrange Road West (S24) has a very high PTAL with clear potential for higher residential densities in the vicinity of Forest Gate station. However, heritage sensitivity is high. In this context therefore, **MM43** justifiably reduces the maximum height from 19 to 8 storeys due to the sensitive heritage context and emerging accepted heights on other parts of the site.

*(iv) Environmental impact of tall buildings*

53. Concerns were expressed that some of the existing areas in the Policies Map identified for tall buildings would lead to a harmful impact on the public realm, including markets and parks, as well as private gardens, and the appropriateness of continuing to construct high rise development in the Borough as a whole was also questioned.
54. However, the clear thrust of the London Plan, both in the ALP and the DLP, underlines the importance of a continued emphasis on tall buildings which: *"have a role to play in helping London to accommodate its expected growth as well as supporting legibility across the city"*<sup>14</sup>. It is therefore clear that a reduction of the areas in the Policies Map for tall buildings or a moratorium of high rise building altogether would fundamentally conflict with the adopted and draft London Plan and also national policy.
55. Policy SP4 fully addresses the environmental and community impact of tall buildings and section 3b of the policy establishes a set of criteria against which to assess the suitability of schemes for tall buildings. These criteria include scale, form and silhouettes, external materials, local and historic context,

<sup>14</sup> Extract from DLP policy D8 Tall Buildings (page 126).

impact on streetscene and cityscape, microclimate, contribution to legibility, management of communal spaces, design credibility, safety and ecology, including watercourses. Policy SP4 therefore contains sufficient detailed criteria to safeguard against significant harmful impact on the public realm and public amenity.

*(v) Relation to neighbouring Boroughs*

56. In recent years, very high buildings have been erected almost on the border of Newham, although not directly adjacent, both in Tower Hamlets and across the river in Greenwich. Concern was expressed that because the planning regime in Newham is much more restrictive, there is an unnecessary mismatch.
57. Whilst the design and impact of development in neighbouring Boroughs should not be ignored, the primary policy driver, in my view, must be whether new development within Newham would be acceptable in terms of impacts on its immediate setting within the Borough, on amenity considerations and on public transport capacity. I consider that the policy SP4 approach gets the balance right in this respect.

*Policy SP4 – Conclusion*

58. Policy SP4, subject to the above modifications, sets a balanced and reasoned approach to the development of tall buildings in Newham over the plan period, with several Strategic Sites having increased indicative tall building heights from the submitted Plan. For effectiveness **MM3**, which focuses on the location of the tallest buildings at key locations, is also necessary to ensure that the location of the tallest buildings are considered as part of the masterplanning process.

*Successful town and local centres*

59. Town centre first approach: Policies SP6 and INF5 provide a comprehensive framework for establishing a strict 'town centre first' approach, and a clear stance to resist out-of-centre development. **MM31** clarifies in policy INF5 that retail proposals are expected to respond to changing retail capacity and behaviour, and sets out the provision of benchmarks for the hierarchy of centres for convenience and comparison retail floorspace in sq metres, which is necessary for the justification and effectiveness of the Plan.
60. Gallions Reach: Policy INF5 points to the need for Gallions Reach Shopping Park to become a major centre serving the eastern edge of Newham and the wider growth area. I note that it is not possible at this stage to draw a boundary for the proposed major centre, although a reconfiguration, possibly to the south of the existing retail park, appears to be likely; a big factor is the location of the proposed new DLR station, but no detailed design work has yet been undertaken. Therefore, placing a fixed boundary at this stage would be premature and potentially unrealistic, and not appropriate or in the interests of the positive preparation or effectiveness of the Plan.
61. Night time economy: Policy J1 ensures the night-time economy is carefully managed, and policy SP9e sets out criteria to prevent an over-concentration of hot-food takeaways. **MM6** more firmly establishes the more detailed criteria

in policy SP9 in relation to the cumulative impact of hot food takeaways, primarily in the interests of safeguarding existing amenities and residential living conditions, in accordance with paragraph 17 [4] of *the Framework*, which is necessary to make the policy justified, effective and positively prepared.

### *Issue 3 - Conclusion*

62. I conclude in relation to Issue 3 that the Successful Places policies (SP1-6), subject to the above modifications, are justified and effective to meet existing challenges and those which are likely to arise from the intensification of development over the plan period, whilst policies INF5, J1 and SP9, again subject to the above modifications, are sound.

**Issue 4 – Do policies J1-J3 satisfactorily address Newham’s employment needs over the plan period? Do they set out a sound framework for achieving a sustainable housing/employment balance; delivering efficient and effective use of employment land; and addressing the needs of Newham residents for access to jobs?**

### *Newham’s employment needs over the plan period*

63. A recent GLA employment projection points to the delivery of around 60,000 jobs in Newham over the period 2018-2033<sup>15</sup>. A GLA Economics Forecast<sup>16</sup>, which combines trend-based and capacity-related data, forecasts an increase of around 57,000 jobs in the Borough over the period 2016-2031. With an estimated increase in 2,000 self-employed jobs forecast over this period, I consider a figure of 60,000 jobs to be appropriate for the Borough over the plan period.
64. These figures partly reflect a strong economic performance arising from the ambitious programme of regeneration and provision of new infrastructure in recent years, and also take into account Newham’s population growth. Economic productivity is seen to have benefitted from intensification of development, which is a trend set to continue and is positively promoted by the Council. This is reinforced by recent planning permissions for significant business/ office/ light industrial (Use Class B1) floorspace (280,750 sq m) in the Borough, such as the ABP development in the Royal Docks, alongside further consents for 7,000 sq m of general and some special industrial (Use Classes B2/B3) floorspace.
65. As in other parts of London, there has been a significant shift away from large industrial areas to mixed use, although areas of generally heavier industry remain, some of it linked to wharf - based activity on the River Thames. Clearly there needs to be an acceptable balance secured between meeting the growing housing needs of the Borough and ensuring that the employment needs of all sectors of the economy are met.

<sup>15</sup> GLA 2017 Employment Projections by Borough (2004-2050).

<sup>16</sup> GLA Economics (2017) London Labour Market Projections 2017.

*Do policies J1-J3 establish a sound framework to meet Newham's employment needs over the plan period?*

66. The Plan's business and jobs strategy, in policy J1, is to encourage continued development and promotion of the 'Arc of Opportunity'<sup>17</sup> and employment hubs as high quality business environments. Key elements include directing major office development to Stratford, whilst major industrial development will be directed to and, where appropriate, intensified at Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs). Town centres are identified for commercial uses, including those related to the visitor economy, together with the Strategic Sites in the Royal Docks, Thames Wharf Strategic Sites, around London City Airport and ExCel employment hubs.
67. Policy J2 aims to use employment land efficiently to support suitably located growth sectors with limited, plan-led managed release of land. The policy lists SILs and LILs, which are designated for protection and, where appropriate, Managed Intensification. Several other sites are to be released from SIL protection, subject to Managed Release criteria.
68. Finally, policy J3 covers skills and access to employment and aims to ensure that more Newham residents share in the increasing wealth associated with the expanding local and London-wide economy.
69. On the balance of evidence, I am satisfied that policies J1-J3 establish a sound framework to satisfactorily address Newham's employment needs over the plan period.

*Does the Plan set out a sound framework for achieving a satisfactory housing/employment balance; and delivering efficient and effective use of employment land?*

70. The need for a balance between the provision and protection of housing and employment land is critical, given the importance of both to the Newham and Greater London economies. A key consideration focuses on whether the need for significantly increased housing provision in London is sufficiently great to either justify the re-designation of some of the land that is protected as SILs/LILs in the Plan, or whether some of the mixed use schemes should be residentially led rather than employment led. The utilisation of the air space above industrial land - a solution referred to as 'co-location' – was put forward as a way of optimising PDL and delivering additional housing land.
71. Bromley-by-Bow Gasholders: The 'Parcelforce' site, which is subject to employment-led development (policy S11), relates well to the adjacent SIL to the south, so that employment-led development is the appropriate course for the Plan to take. The setting of the iconic gasholders, which are strident in the landscape, merits their protection in the policy. **MM39**, therefore, requires that new development should take into account its impact on their setting, so that they will form an important cue in any design-led solution. I do not agree that because the heritage assets are fenced off, they add little to the public realm. The former gasholders have a public heritage value as they currently stand, but an imaginative scheme could achieve significantly enhanced

<sup>17</sup> The 'Arc of Opportunity' can be defined as an area broadly running from Stratford in the north-west of the Borough, running down the western side of the Borough alongside the River Lea, and then along the southern side along the River Thames, including the Royal Docks and then to Gallions Reach and Beckton in the south-east.



community benefits, including tackling the issue of the existing unattractive security fencing. MM39 is therefore justified in tackling this environmentally sensitive issue as a key component in relation to other key issues such as viability of gasholder remediation and development cross-subsidy.

72. I also note that the important east-west links between West Ham and Bromley-by-Bow which impact on this site will be taken on board in amendments to the Policies Map.
73. I therefore consider that policy S11 provides an appropriate balance with clear design parameters, but within this framework there is considerable flexibility without undermining the broad thrust of the Plan's employment, heritage and design-led provisions. The policy, which would potentially deliver new housing in addition to employment uses, would also comply with the Council's stance towards tall buildings (policy SP4), and I therefore consider it to be sound without modifications.
74. Thameside West and East: Concerns were expressed that the SIL designations, especially alongside the River Thames, are too inflexible to respond to changing circumstances, so that they do not allow these accessible and sustainable sites to maximise housing densities or even enable any housing to be developed in these areas. These concerns focus in particular on the proposals for Strategic Sites at Thames Wharf (S08), Silvertown Landing (S09) and North Woolwich Gateway (S04).
75. The Thameside West /Silvertown Landing designations are on high profile sites, directly viewed from the river. The change to the Policy Map to amend the SIL boundary better reflects the alignment with appropriate buffering following the Silvertown Tunnel Consent Order which was allowed by the Secretary of State on 10 May 2018. A proposed change to the wording of Strategic Site policy S09 reflects the SIL to be retained, and recognises the potential for further limited release through Managed Intensification **[MM37]**. This modification is necessary for the positive preparation and effectiveness of the Plan and provides the necessary flexibility in the face of the impact which the proposed tunnel will have on this area; it is supported by a SCG between the Council and the Mayor of London<sup>18</sup>.
76. Several concerns related to both these modifications and the overall SIL designations for Strategic Sites S08 and S09.
77. Regarding the quality of the evidence base, there is a considerable body of evidence to demonstrate the importance of SILs, especially along the Thames waterfront, including providing river access for existing heavy industry. I therefore do not accept the argument that sites S08 and S09 should not even be partially allocated as SIL.
78. The shape of the additional SIL area at the western end of the Silvertown Landing site (S09) is not arbitrary; it is a line drawn up in detail with Transport for London (TfL), which reflects the development potential that has been sterilised by the Silvertown Tunnel land requirements.
79. The potential for tall buildings in relation to Strategic Sites S08 and S09 is addressed in MM 36&37 above. It is clear from my earlier comments that I do

<sup>18</sup> SCG: Thameside West/Silvertown Landing (S09); updated 26 June 2018.

not consider that the policies covering tall buildings in relation to these sites were made in a vacuum.

80. Regarding the strategic nature of sites S08 and S09, policy J2 articulates the strategic principles for the efficient use of employment land, including SILs. It is a detailed, nuanced policy, which deals comprehensively with Managed Intensification, Managed Release and Managed Transition criteria. It aims to secure a sustainable balance between protecting existing industry and commercial businesses where appropriate, whilst enabling an ambitious release of land for housing and securing operational requirements of existing employment areas and safeguarding the living conditions for existing and future residents. This is a complex issue, which policy J2 addresses at an appropriate level of detail and sensitivity, and I therefore do not consider the policy to be a 'sledgehammer' or that it is unnecessary.
81. Regarding the juxtaposition of the SIL and the proposed park at Silvertown, the park proposal responds to the area on which there will be constraints on building over the safeguarded land for the Silvertown Tunnel. Modern industrial uses can be designed to take account of the park, and there is no reason why the strategy of transition necessarily would harm the character and appearance of the park in relation to the juxtaposition of the two designations.
82. In relation to Managed Intensification, the modifications to include working definitions of managed transition **[MM52]** and employment-led development **[MM8]** are necessary for the Plan's effectiveness and positive preparation.
83. On the basis of the above considerations, I consider that the Plan's provision for Strategic Sites S08 and S09 is, subject to the above modifications, sound and that no further modifications are required.
84. North Woolwich: On the basis of alleged weak demand for industrial land in Newham, it was suggested that the Plan should have explored opportunities for SIL consolidation in areas such as the Standard Industrial Estate (SIE) at North Woolwich, which is part of the SIL stretching westwards; and that it could become an area for Managed Intensification with scope for release to residential, with a potential for 1,000 units. Further evidence from the Council<sup>19</sup>; and from the representors<sup>20</sup> provided a helpful background to a complex issue.
85. The key arguments for expanding Strategic Site S04 to include the SIE are based on the alleged underperforming nature of the SIE, planned increases in accessibility to a PTAL score of 3 in the "short to medium term", and the clear potential for comprehensive Managed Intensification – and therefore deliverability and finally, housing need.
86. Much of the SIE comprises functioning industrial sites, providing an important source of local employment. Some of the sites have modern industrial units. These activities are likely to be considerably disrupted by comprehensive redevelopment. The yard space, rather than being an 'inefficient' use of

<sup>19</sup> LBN: Matter 12 – Note for the Inspector concerning Strategic Site S04 and the adjoining Standard Industrial Estate.

<sup>20</sup> Rolfe Judd: Matter 12 – Response to LB Newham Written Note concerning Strategic Site S04 and the adjoining Standard Industrial Estate; 6 July 2018.

space, is now justifiably regarded by many operators and agents as a key part of SIL functionality. I therefore consider that including the SIE within Strategic Site S04 would not accord with the Council's aim to encourage local industry, and that the likely disruption may result in potential harm to local jobs and the local economy. In contrast the SIL to the east which is included within the strategic site boundary for redevelopment has already been cleared for other reasons (end of satellite use by BT and Crossrail Act Works), therefore enabling it to contribute to a net increase in SIL capacity.

87. The suitability of this area for residential development is compromised by its current low PTAL (2) and being isolated between the Elizabeth Line, currently under construction, and the river, although its PTAL could increase to 3 at some point in the future, e.g. with improvements with new bus services using the Silvertown Tunnel which is programmed for completion within the plan period. A further complication is that five different freehold ownerships would need to be co-ordinated, and this may not be easy to achieve.
88. It is for all of the above reasons that I consider that the Plan is sound as it stands in relation to Strategic Site S04.
89. Marketing employment land: Evidence of a stressed industrial land market shows a lack of a market for industrial sites and a high level of industrial land release, driven by residential hope value affecting either prices sought by landowners or even whether such sites are put onto the market for their designated use. This is forcing businesses (especially small concerns) into sub-optimal sites. This points to a need to provide a reservoir of employment land, both to provide for Newham's own residents and businesses, but also for the needs of industry and commerce from nearby London Boroughs where there has been a squeezing out of such uses due to pressure for residential development, which of course can command significantly higher rates of economic return.
90. This points to the need for the Plan to provide a framework for consistent decision making in relation to marketing employment land for other uses. **MM7** is therefore necessary to set out robust marketing criteria in order to achieve consistency of decision making in the implementation of policy J2. It requires an adequate marketing period through commercial agents at a price that reflects market value for industrial use for at least 12 months prior to the release of employment land. On balance I consider this to be a reasonable period for the effectiveness of the Plan, and will assist in securing the necessary land, sites and buildings for the provision of the 60,000 new jobs over the plan period as part of the work/homes balance to enable the Plan to be sustainable.

#### *Skills and Access to Employment*

91. Policy J3 seeks to secure 35% of all construction phase jobs and 50% of all post-construction (end user) jobs for Newham residents. This policy is clearly aspirational, but it responds to the legitimate need to maximise local economic opportunities in pursuit of Good Growth. This is important in an area which suffers from high levels of multiple deprivation, with youth unemployment highlighted as a particular problem. The implementation of this policy is subject to viability considerations and therefore contains a necessary and

important element of flexibility to ensure that the Plan continues to be effective.

#### *Issue 4 - Conclusion*

92. I conclude in relation to Issue 4 that the employment policies (J1-J3), subject to the above modifications, are sufficiently justified, effective, focused and flexible to satisfactorily address Newham's employment needs over the plan period. They establish a sound framework for achieving a sustainable housing/ employment balance; a balanced approach to wharf consolidation along the River Thames; delivery of efficient and effective use of employment land; and they address the needs of Newham residents for access to jobs.

#### **Issue 5 – Are the housing policies (H1-4) in general conformity with the Adopted London Plan (ALP) and national planning policy in relation to the quantum, deliverability and qualitative provision of new homes for Newham?**

*Is the provision of at least 43,000 new homes for Newham over the plan period justified?*

93. The ALP makes provision for a minimum of 19,945 new homes within the London Borough of Newham over the period 2015-2025, at an average of 1,994 dwellings pa. The provision of 43,000 new homes for Newham over the plan period 2018-2033, averages 2,867 dpa, which exceeds the ALP target by a considerable margin. The Plan also needs to be considered against the requirements of *the Framework*. The core planning principles in paragraph 17 of *the Framework* require planning to proactively drive and support the homes that the country needs, whilst paragraph 47 requires local planning authorities to boost significantly the supply of housing, to meet the full objectively assessed needs (OAN) for market and affordable housing (AH) over the plan period, including the supply of specific deliverable sites to provide five years' worth of housing against their housing requirements.
94. The background to the figures set out above is the evidence pointing to the continuation of Newham's population growth over the plan period. An ambitious housing strategy is therefore needed for the Borough. It is necessary, firstly, to address the background of housing needs and targets from the GLA and national government, covering different areas and time periods.
95. The Council's Housing Statement<sup>21</sup> sets out the four principal sources of demographic information which have informed its consideration of its objectively assessed housing need (OAN). These are the Outer North East London (ONEL) Strategic Housing Market Assessment (SHMA) (2016)<sup>22</sup>; the London Plan (ALP) (2016); the Draft London Plan (DLP) (2017); and the Ministry for Housing, Communities and Local Government (MHCLG) Local Housing Needs Figure (2017). The ONEL figures are acknowledged to be robust, using an accepted methodology, which has been tested at numerous independent examinations, and it analyses detailed information relevant to the local area context. For these reasons I consider that the ONEL figures are a reasonable basis for considering the housing requirements for Newham.

<sup>21</sup> LBN Matter 6 (Homes) Statement, in particular see Table A.

<sup>22</sup> Examination Document EB03; dated 2016.

96. The ONEL Strategic Housing Market Assessment (SHMA) points to a housing needs figure of 51,800 units for Newham over a 22 year period (2011-2033), i.e. an annual target of 2,355 dwellings, which the Council considers is its OAN figure. This is higher than the GLA (2016) figure of 1,994 dpa, which is the current housing target in the London Plan.
97. As a transitional arrangements Plan, it is not being tested against the standard method as set out in the MHCLG assessment, which gives an annual housing needs figure for Newham of 3,840. In any case, this figure includes the area of Newham that falls within the London Legacy Development Corporation – a separate plan-making authority – thus is not directly comparable to the existing or emerging housing targets that are the subject of discussion.
98. The GLA's emerging DLP target for Newham is for 38,500 dwellings over ten years<sup>23</sup>. The Council has agreed with the GLA over the potential quantum of dwelling units to be derived from large sites<sup>24</sup> which amounts to a figure of 28,850 units over the plan period. However, the issue of the 9,500 units to be released from small sites over the ten year period (2019-2029) is currently a source of disagreement between the GLA and the Council.
99. This as yet untested target is a combination of bottom-up capacity-derived housing delivery potential from identified large sites (0.25 ha and above) together with a cumulative total for small sites (below 0.25 ha), based on top-down GLA modelling. Through the addition of the latter, the overall target represents an uplift of 33% on what was previously thought to be deliverable on identified large sites.
100. In relation to small sites potential, the Council's monitoring figures show that their delivery over the last five years (2012/13-2016/17) has averaged 234 units pa, i.e. considerably short of the 950 dpa GLA figure.
101. Secondly, the GLA small sites figure is a pan-London application to all terraced houses with a PTAL rating of 3 and above or within 800m of a tube/rail station or a town centre boundary. From the evidence, I have identified two issues with this methodology in relation to Newham. Firstly, the GLA assumption is based on the sub-division of terraced housing, which would make these smaller units in many cases too small and therefore unsuitable for family housing. This methodology therefore runs counter to the Council's identified need for more family housing, an issue which I will address more fully later in my report.
102. The second issue is that the GLA standardised approach does not take into account the significant variation in the size and character of terraced housing across London. This is relevant in Newham, where the evidence shows the typical terraced house in the Borough being a small, two or three bedroomed Victorian structure, as opposed to the larger, Georgian terraces which are prevalent or at least more common in some other London Boroughs.
103. Furthermore, it is highly likely, based on the Council's evidence over the last five years, that more homes have been converted than are currently included in the planning records, thus reducing even further the potential for delivering

<sup>23</sup> Mayor of London: The London Plan [which is currently the Draft London Plan (DLP)]; December 2017; Table 4.1, page 146.

<sup>24</sup> Large sites are defined as 0.25 ha and above (see LBN Matter 6 (Homes) Statement, page 3, paragraph 2).

new subdivisions in Newham. The arguments in support of the Council's considerably lower small sites allowance were not robustly challenged, either in written representations or at the Hearing sessions, including from those who argued for the Plan to take the emerging DLP figures into account and increase the OAN accordingly. Based on the above evidence, I consider that the Council's figure for small sites potential in Newham is justified and realistic.

104. In summary, I consider that the OAN which has been used by the Plan, based on the ONEL SHMA, is justified and realistic for Newham. The GLA's response to the Plan is to agree that its proposed housing target is acceptable, subject to an immediate review of its Plan in order to identify sources where additional housing capacity can be brought forward; I have already explained that MM10 makes provision for this.

*Is the overall housing provision for Newham deliverable over the plan period?*

105. The provision of 43,000 new homes for Newham over the plan period is in general conformity with the ALP provision for the Borough. As I have already concluded in Matter 1, this is the appropriate figure for the Plan; it is also a minimum figure on which there is every expectation based on current evidence that it will be exceeded by a considerable margin.
106. The Council's housing target capacity calculations<sup>25</sup> show that actual delivery since 2015/16, together with the capacity of sites to continue to deliver in 2017/18, and potential to deliver over the remainder of the ALP period (to 2024/25), based on the SHLAA 2017 methodology, provide a total of 23,710 dwelling units. This exceeds the ALP target (19,945) by 3,755 units, or 18.88%, which can be rounded to 19%. This is a significant uplift on what was previously considered to be deliverable. The Council has then applied the 19% increase to its assumed deliveries on key sites within the Borough.
107. The application of this 19% increase was further examined in relation to the Council's assumptions over housing delivery on Strategic Sites<sup>26</sup>. This detailed evidence shows that for 16 out of the Plan's 31 Strategic Sites, 17,489 units have planning permission. This represents 40% of the housing target of the Plan. Over 8,000 of these units (47%) on eight of these sites are already under construction.
108. The Council confirms that none of the current Section 106 negotiations are expected to experience significant delays on account of the negotiation process and that developers in most cases have confirmed dates when they intend to start on site. It is also clear that the Council maintains a strict and dynamic monitoring and a positive development management regime.
109. From the detailed evidence referred to above, as well as from discussion at the Hearing sessions, I consider that the Council's 19% uplift is a reasonable assumption. Although concerns were expressed that the Plan is too cautious, the Council's calculations of the likely housing delivery on the Strategic Sites, and on its stance regarding small sites capacities were not robustly challenged during the Examination. A clear trajectory showing the projection of housing figures over the plan period is also necessary to ensure the positive

<sup>25</sup> LBN: Matter 6 Statement, Table B.

<sup>26</sup> LBN: Note from the Council to the Inspector in Relation to Matter 6, specifically housing delivery; 26 June 2018.

preparation of the Plan, and **MM9** secures this, in accordance with national policy.

110. Apart from my conclusion that further sites are not needed to meet Newham's housing target, I also conclude in Issue 4 that in most cases the release of SIL land to other uses including housing is not justified in order to enable the Plan to deliver the required quantum of housing to meet its OAN.

111. The submitted Plan indicates that a total of 41,432 dwellings are likely to be developed across all 31 Strategic Sites. I therefore conclude that the housing provision for Newham as set out in the Plan is deliverable over the plan period. It is justified, effective, positively prepared and in accordance with national policy.

*Can the Plan demonstrate a five year housing land supply for Newham?*

112. The Council proposes a stepped housing target, which would result in three distinct tranches of housing delivery, based on the likely phasing of the Strategic Sites. The provision for the 'delivery phases' is set out in policy H1, and the different rates of delivery reflect the fact that the Strategic Sites in Newham typically take longer to come forward than many conventional, smaller sites. In fact, Newham encounters significant challenges implementing development on many of its large sites, which are virtually all on previously developed land (PDL). The SHLAA remains cautious about the rapid delivery of some of these sites, although there is evidence, which I have previously referred to<sup>27</sup>, that some of these sites could be developed to a greater extent within the next five years. I am satisfied from the evidence that this stepped approach is justified and realistic for Newham.

113. However, in taking a cautious approach, the Council is not proposing an annual 2,876 unit target, but one which varies as follows:

- Short term (2018/19-2022/23): 32% of total; 13,760 units at 2,752 pa
- Medium term (2023/24-2027/28): 46% of total; 19,760 units at 3,956 pa
- Long term (2028/29-2032/33): 22% of total; 9,460 units at 1,892 pa

114. In accordance with the above stepped housing target, it is clear that the Council can demonstrate a five year housing land supply against a target of 2,752 homes pa.

115. The table below illustrates how the Council's five year housing supply would be delivered against a target of 13,760 units, with a small surplus. These figures, which were discussed at the Hearing sessions, were not robustly challenged. The key elements are the stepped target, and whether a 5% buffer is appropriate, and the Council's recent completions figures persuade me that there has not been persistent under-delivery and thus justify this percentage.

<b>5 year housing supply target</b>	<b>13,760</b>
Forecast Provision	14,289
Surplus/Deficit	+ 529
Additional capacity from reduced probability on sites without planning permission	188
5% buffer (required under NPPF47)	688
5 year supply target plus 5% buffer (required under	14,448

<sup>27</sup> LBN: Note from the Council to the Inspector in Relation to Matter 6, specifically Housing Delivery; 26 June 2018.



NPPF47)	
Surplus /deficit	+ 29

Source: Council's Housing Statement in response to Inspector's Matters, Issues and Questions

*Is the Affordable Housing provision in the Plan justified and deliverable?*

116. Policy H2 sets a range of affordable housing (AH) requirements from 35% to 50% of total units on individual sites having a capacity for 10 units or more, with a required tenure split of 60% social housing and 40% to be intermediate homes. The Plan aims to deliver mixed and balanced communities by facilitating a range of accommodation that allows people to move between tenures and property size as their household and economic circumstances change. Delivery of AH, however, has been below the level of need as set out in the SHMA, which is set at around 43%.

117. Some representations argued for limiting the proportion of AH required on sites for viability reasons. The levels in the Plan, however, are based on up-to-date viability evidence<sup>28</sup>, as well as in response to need, and it was acknowledged by the Council that AH provision was often a fine balancing act, often linked to family housing needs (see below). I consider that policy H2 gives a clear steer for the provision of AH but with some flexibility included, and is therefore sound as it stands.

*Family housing – is the 39% target realistic?*

118. The requirement in policy H1 for 39% of the number of new homes on all sites capable of delivering 10 units or more to be for 3 bedroom homes for families is viewed by some as onerous and too prescriptive. I agree that some development sites may not be suitable for family housing for a variety of reasons, and I note that the London Housing SPG shows GLA projections which show that nearly 70% of household growth over the period 2011-2035 will be for households without children.

119. However, based on the ONEL SHMAA, the level of need for three bedroom housing within Newham (as opposed to Greater London as a whole) is put at 64% of the Borough's overall housing requirement, with a further 9% for dwellings of 4 plus bedrooms.

120. Two bedroom dwellings may be part of the answer, but it is clear that the 39% requirement only provides a little over half of the need in the Borough for family housing. This in itself provides considerable flexibility, added to which all schemes of fewer than 10 dwellings are exempt from the policy. It could be argued that, in the face of the objective evidence, the proportion of family housing should be higher in the Plan.

121. On the basis of the evidence which I consider to be most appropriate for Newham, I consider that the provision for family housing within the Plan is justified with sufficient flexibility for the Plan to be effective.

<sup>28</sup> BNP Paribas Real Estate: LBN Local Plan and CIL Viability Assessment; November 2017.

*Does policy H3 adequately address the range of specialist housing requirements for Newham?*

122. Policy H3 articulates the Council's aim to ensure that local and strategic needs for all types of households are considered and appropriate forms of accommodation are provided in the right locations. The policy sets out clear criteria to meet this range of needs, including for student accommodation, housing for older people, housing for vulnerable groups, e.g. night stay and temporary accommodation, and houses in multiple occupation.
123. The criteria in the policy provide strong direction whilst applying sufficient flexibility to make the Plan effective in addressing a wide range of housing needs in the Borough. The Plan also acknowledges the importance of adequate monitoring to ensure its effectiveness.

*Are the living conditions of existing and future residents adequately safeguarded in the Plan?*

124. Policy SP8 aims to ensure neighbourly development and sets out a comprehensive range of criteria. **MM4** includes 'disturbance' as an additional key living conditions consideration, which is justified in the context of increased intensification of housing across the Borough.
125. Newham has a large amount of industrial land and there is a strong commitment to introduce more mixed use development; in these circumstances it is necessary to ensure that an 'Agent of Change' approach is implemented to ensure that different uses are able to exist alongside each other satisfactorily. **MM5** provides a robust working definition of 'Agent of Change' to ensure that this key approach is implemented throughout the Borough, in the interests of the Plan being effective and positively prepared.

*Does the Plan deliver on gypsy and traveller accommodation?*

126. The Inspector's Report into the recently adopted Gypsy and Traveller Accommodation Development Plan Document (DPD) (2017)<sup>29</sup> concluded, subject to the inclusion of proposed modifications, that the DPD would form a sound basis for the determination of proposals for accommodation for gypsies and travellers. Policy H3 also allows for some flexibility, and a modification secures that in the case of accommodation for (non-nomadic) gypsies and travellers that fall outside the PPTS definition, quality standards should be agreed in consultation with representatives of the local gypsy, traveller and travelling showpeople community [**MM14**]. This modification is justified and accords with national policy.

*Other housing sites*

127. Several unallocated sites were suggested for inclusion as additional housing allocations in the Plan. For the reasons given above, I consider that the Plan is likely to deliver the appropriate quantum of new housing to meet (and exceed) the requirements of the ALP without the inclusion of any additional allocated sites.

<sup>29</sup> Report to the Council of the London Borough of Newham- Report on the Examination of the LBN Local Plan, Gypsy and Traveller Accommodation DPD; 28 June 2017

128. Lady Trower Trust Land: A representation, for the allocation of land known as Lady Trower Trust in East Ham for approximately 200 dwellings, argued that the Plan should review the Metropolitan Open Land (MOL) designation on this land of alleged low environmental quality and which could deliver a significant amount of AH.
129. The MOL, however, is a GLA policy. It is not in need of a review in this Plan, although potential exists at the site to bring the land into greater public accessibility, possibly through active green infrastructure (GI) use. It is also located in a high risk flood area (zone 3). The proposal for 51% AH is a strong material consideration in support of the scheme, but more detailed information needs to be submitted to persuade the Council that this scheme might be favourably considered as a departure from the Plan at some point during the plan period. For the reasons given, I am not proposing any modifications in relation to the Lady Trower Trust Land.

#### *Issue 5 – Conclusions*

130. On the basis of the above considerations, I conclude that the Plan, subject to the above modifications, is justified, effective, positively prepared and accords with national policy and is in general conformity with the ALP, including the Government's prioritisation of the delivery of new homes; that the provision of at least 43,000 new homes over the plan period is justified and deliverable within the plan period; that the Plan can demonstrate a five years' housing land supply; that it sets out a sound framework for delivery of AH, family housing, specialised housing and accommodation for gypsies and travellers; and that it positively addresses the safeguarding of living conditions in the Borough.

#### **Issue 6 - Do policies INF 1-8 set a sound framework for the delivery of infrastructure, including utilities, transport, green and social infrastructure, to meet the Borough's needs over the plan period? Does the Plan provide an adequate framework for environmental resilience including air quality, in the face of climate change?**

##### *Waste and Recycling*

131. Policy INF3 sets out the strategic principles for managing waste and the development of waste facilities. **MM29** is necessary to ensure that sufficient water and waste water capacity exists to ensure the effectiveness and positive preparation of the Plan.
132. Thames Water (TW), which operates the Beckton sewage treatment works (STW), expresses concern over the anticipated increase in loading over the plan period. In view of this, TW suggests that the area adjacent and to the north-west of the STW known as the Northern Lagoon, should have its MOL status removed, together with the designated local green space which 'washes over' the existing inlet works. In response to this concern, the Council deletes the above mentioned local green space from the Policies Map in the interests of ensuring the effective operation of the STW, in accordance with the core principle in paragraph 17 of the Framework, to proactively support the infrastructure the country needs and in the interests of the effectiveness of the Plan.

133. However, by keeping its MOL status, the Northern Lagoon site will be protected from other forms of development which could jeopardise any future expansion of the STW. Until robust evidence including a specific programmed date, demonstrates the need for this land for operational purposes within the plan period, I can see no justification for deleting the site's MOL status and replacing it with operational land status.
134. Some concerns were raised over the proximity of an expanding STW to the development of nearby residential uses within the proposed Beckton Riverside Development. In response, **MM28** introduces a change in the implementation section of policy INF4, which ensures that new development proposals in the vicinity of Beckton STW should undertake Odour Impact Assessment, plus necessary mitigation; clarifies who is responsible for mitigation work; and ensures that the living conditions of future inhabitants in the Riverside area will not be adversely affected by reason of odour. These are necessary for the effectiveness of the Plan. Policy INF4 also provides for sufficient capacity to meet the needs of development of utilities infrastructure over the appropriate time horizon.
135. **MM25 & 27** make the Plan effective and positively prepared by clarifying the relationship between the new Strategic Site allocation at Beckton Riverside and the Joint Waste Plan in order for the Plan to be effective and positively prepared.
136. The change to policy INF3, to ensure that all major development proposals should be accompanied by Site Waste Management Plans [**MM26**] is also necessary for the effectiveness of the Plan and accords with national policy.

#### *National Grid Infrastructure*

137. In response to the need to ensure that National Grid high voltage electricity power lines are safe in relation to adjacent development, **MM56** addresses these important access and safety considerations, including relating to high voltage cabling, which is necessary for inclusion in policy INF4.3.g. This ensures that the Plan is effective and positively prepared. **MM30** addresses the pressing need for infrastructure capacity upgrades in the interests of the effectiveness of the Plan.

#### *Infrastructure Delivery – Does policy INF9 and the Infrastructure Delivery Plan (IDP) provide sufficient guidance for the effective implementation of the Plan?*

138. Policy INF9 provides a greater level of detail on the delivery of the necessary infrastructure than in the Core Strategy. **MM1** introduces a change to policy S3 in relation to the Royal Docks, to acknowledge that, if the delivery of housing far exceeds the current estimates, the infrastructure requirements will need to be revisited (in discussion with the Council) in the interests of the continued effectiveness of the Plan.
139. The most critical schemes which are set out, programmed and costed in the IDP, which is regarded as a 'live' document, relate to increasing DLR capacity and capacity upgrades at key highway interchanges. Other critical schemes relate to education, healthcare, estate modernisation, utilities and flood risk. There are no perceived 'showstoppers' (defined as issues which are critical to the implementation of the Plan, which if unsolved/unfunded could potentially

derail the Plan). The Council is actively seeking financial opportunities on a project-by-project basis, and has a good track record in this respect. The evidence points to the conclusion that the policy and the IDP provide sufficient guidance for the effective implementation of the Plan.

140. I am also satisfied that policy INF4.1.c, which covers decentralised energy generation, is clear and justified with sufficient detail to enable effective implementation.

*Do policies INF1 and INF2 establish a sustainable framework for strategic transport provision in Newham?*

141. Policy INF1 sets out the principles for securing investment in strategic transport infrastructure to support the growth outlined in the Plan. A key component of transport infrastructure delivery is the Local Implementation Plan (LIP), which identifies how the London Boroughs are funded by TfL to deliver the outcomes of the Mayor's Transport Strategy<sup>30</sup> at a local level. Neither the GLA nor the TfL has raised any soundness concerns in relation to these policies, and I have no evidence to point me to a different conclusion.
142. Policy INF1 also seeks to overcome major physical barriers; this is in line with the PLA's vision, which seeks to achieve better river crossing infrastructure, to enable the transport of freight and improved connectivity of people. Moreover, the PLA is in a key position to ensure that no design elements that would prevent the full range of river uses to continue, including large sea going vessels, would be permitted.
143. The modification to policy S5, to ensure that the large strategic site at Beckton Riverside (S01) will require joint working with TfL on developing options for DLR extensions, a new station, a new or extended DLR depot and river crossings **[MM2]**, ensures the positive preparation of the Plan and its effectiveness.
144. Concerns were expressed that an expanded DLR depot at Beckton Riverside would harm the living conditions of nearby residential occupiers. The depot scheme is necessary to serve TfL's plans to expand and improve the DLR network, in line with the ambitious housing and employment targets in the Plan and elsewhere in East London. The development of the DLR is critical to the growth strategy of the Plan, especially given the heavy reliance of proposed development in sites in the Arc of Opportunity.
145. The SCG between inter alia the Council and the mayor of London/TfL/GLA<sup>31</sup> refers to a masterplan agreement which facilitates depot expansion by an amendment to SIL designation/managed release and requires the DLR depot planning to minimise the spatial impacts both in terms of land take and neighbourliness. This is covered by the requirement in policy SP8 **[MM4]** to minimise disruption and disturbance to existing living conditions of neighbouring residents. On the basis of the above considerations, the inclusion of this scheme as a specific part of policy INF1.1 b **[MM23]** ensures the necessary clarification to ensure the positive preparation and effectiveness

<sup>30</sup> Mayor of London: Mayor's Transport Strategy; March 2018 [Examination Document EB14].

<sup>31</sup> SCG between LBN; the Mayor of London/TfL and National Grid/St William regarding the Proposed Strategic Development at Beckton Riverside (S01); date 30 May 2018.

of the Plan. I note that there is a need to amend the Policies Map to reflect the SCG.

146. Policy INF2 seeks to ensure a sustainable pattern of movement within Newham, including maximising accessibility for pedestrians, cyclists and public transport. Some representations, referring to DLP policy T6, argued that car-free development should be the starting point for all development locations that are well connected by public transport. Others considered that policy INF2 is too draconian. It also has to be borne in mind that Newham exhibits some of the characteristics of an outer London Borough<sup>32</sup>. This points to an expectation of mixed development in most locations, and therefore a strict application of car-free development across the whole of Newham is unrealistic within the plan period.
147. Moreover, DLP policy T6 which advocates a greater car-free approach has not yet been tested in a public examination, which limits the weight that can be given to it. I also consider that policy INF2, in promoting modal shift towards more sustainable patterns of movement, strikes a realistic balance between modal shift and air quality objectives on the one hand and residents' personal mobility needs on the other hand. Furthermore, I note that modal shift targets are to be set in the LIP (LIP3), which is to be published this year.
148. The Plan's stance is that car parking will be a minor feature in town centres. This is to avoid encouraging the use of private motor vehicles for access and to free up space for other quality-enhancing interventions, and it is counterbalanced by other access improvements across a range of modes, in line with the requirements of paragraph 34 of *the Framework*. I agree with this stance and accordingly, I find no soundness issues relating to car parking provision in the Plan.
149. I am satisfied from the above considerations that, subject to the proposed modifications referred to above, that the sustainable balance sought by policies INF1 and INF2 is justified.

*Air quality – Does policy SC5 strike a realistic focus on enhancing air quality?*

150. Policy SC5, in line with the ALP, requires that all development should at least be air quality neutral and links in with the Council's Air Quality Plan. **MM22** confirms that developments will be expected to focus on energy efficiency before using energy solutions known to have negative air quality impacts (for example combustion based energy, which should only be used as a last resort). This is justified and accords with the core planning principles in paragraph 17 of *the Framework*, to support the transition to a low carbon future.

*Does policy INF8 provide a robust basis for the provision and implementation of all aspects of community infrastructure?*

151. Policy INF8 establishes a framework for the delivery of improved and new social and community service provision across Newham as well the protection of existing community assets.

<sup>32</sup> LBN: Note from the Council to the Inspector in Relation to Matter 8 (Transport), section 2 (i).

152. Regarding the specific needs of some faith groups, as required by the ALP, paragraph 6.278 of policy INF8 specifically includes places of worship in its definition of community facilities which are addressed by the policy. I consider that the policy is all-embracing and promotes social cohesion and that no soundness issues are raised.

153. Regarding the protection and enhancement of community facilities, such as Queen's Market, I am satisfied that the Plan addresses these concerns at the appropriate strategic level and that there is no need for further modifications.

#### *Green Infrastructure and the Blue Ribbon Network*

154. Policy INF6 sets out the framework for protecting and enhancing the Borough's Green Infrastructure (GI) and Blue Ribbon Network. The policy stance on these issues is set out clearly and no soundness issues are raised.

#### *Does the Plan provide an adequate framework for environmental resilience in the face of climate change?*

155. Policies SC1-4 address a range of issues which are covered in chapter 10 of *the Framework*, including flood risk and sustainable drainage, water supply and demand, low carbon energy, biodiversity, and adaptation measures though GI. There is a realistic acceptance by the Council that the Plan's role is limited in addressing environmental resilience. In this context I consider that the Plan strikes an appropriate balance between aspiration and effectiveness and that the Plan's framework for environmental resilience is therefore adequate. The modifications cover enhanced water efficiency, the need to ensure that development proposals take account of the Thames River Basin Management Plan and the expectation that development should deliver net biodiversity gain where possible [MM15; 19 & 20]; they all ensure the Plan is effective and accords with national policy.

#### *Issue 6 – Conclusions*

156. I conclude, based on the above considerations that, subject to the above modifications, policies INF 1-8 set a justified and effective framework for the delivery of both physical and community infrastructure, to meet the Borough's needs over the plan period, and that policies SC1-4 also provide an effective framework to achieve environmental resilience in so far as in is in the gift of the Plan to effectively deliver this.

#### **Issue 7 – Development management, risk and monitoring – does the Plan effectively address these issues?**

##### *Development Management*

157. Policy SP8 sets out a number of development management criteria to ensure that existing and new development can coexist and integrate. The policy also seeks to address future issues which might stem from mixed used developments and intensification in many parts of the Borough and the overall theme of the policy is neighbourliness. I am satisfied that the policy, subject to the modification in relation to living conditions [MM4] which I have already addressed, is sound.



*Does the Plan take sufficient account of risk?*

158. I note the Council's comments at the Hearing sessions that planning in Newham is "rife with risk" and that the role of the Plan is to manage that risk and provide enough 'enabling hooks' to secure robust and satisfactory development. This includes masterplanning, securing the much needed regeneration for this part of East London and the necessary development financing, including taking into account viability considerations.

159. The potential uncertainties in the Beckton Riverside area, including river crossings and DLR depot expansion are addressed in the SCG which has been signed by the principal parties involved in planning Strategic Site S01<sup>33</sup>. On balance, I consider that the Plan strikes an appropriate balance between steering key developments and being flexible enough to respond to likely changes which might occur during the plan period.

*How effective are the Plan's monitoring arrangements?*

160. Part of the mechanism for securing the right balance in the Plan is the monitoring system. This is structured across a framework of outputs and more importantly, outcomes. The GLA has committed itself to an Annual Monitoring Report, and the Council adds to this with locally focused monitoring bulletins. In addition to these formalised data sets, there are also FOI requests and Member enquiries which often look at issues from different perspectives, in addition to feedback from Development Management colleagues at the Council. The monitoring regime will be instrumental in pointing to the need for revisiting infrastructure requirements in the light of development delivery exceeding current requirements [see MM1] and at what stage a review of the Plan will be necessary [see MM10].

*Issue 7 – Conclusions*

161. I conclude, based on the above considerations, that the policy stance on development management, risk and monitoring, is justified and effective.

**Spatial policies and sites**

162. Most of the spatial policies and key sites in the Plan have already been addressed in my report. In the interests of clarity and for the removal of doubt, I consider that the proposed sites for development allocated in the Plan are all justified, deliverable within the plan period and consistent with national planning policy.

## **Public Sector Equality Duty**

163. In reaching the conclusions above, I have had due regard to the Public Sector Equality Duty contained in the Equality Act 2010 and in particular its compliance with Section 149 of the Act, neither will any part of the Plan be a barrier to providing for inclusive design and accessible environments as required by *the Framework*, with particular reference to paragraphs 50 and 149. A typical example which demonstrates the Council's commitment to

<sup>33</sup> SCG between the Council, mayor of London/TfL and National Grid/St William regarding the proposed strategic site at Beckton Riverside (S01) and the DLR expansion requirements and associated aspects of SIL designation and managed release; 31 May 2018.

access for all is policy H3, which addresses a range of specialist accommodation needs, which refers to the need to ensure that the local and strategic needs of all types of households are considered, and that appropriate forms of accommodation are provided in the right locations.

## Assessment of Legal Compliance

164. My Examination of the legal compliance of the Plan is summarised below. I conclude that all aspects of legal compliance are met.

- The London Borough of Newham – Local Plan Review has been prepared in accordance with the Council's Local Development Scheme.
- Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.
- Sustainability Appraisal has been carried out and is adequate.
- The Habitats Regulations Appropriate Assessment Screening Report [June 2018] sets out why an AA is not necessary.
- The Local Plan contains policies, including SC1 (environmental resilience) which are designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
- The Local Plan is in general conformity with the spatial development strategy (The London Plan).
- The Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

## Overall Conclusion and Recommendation

165. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

166. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that, with the recommended main modifications set out in the Appendix, the Newham Local Plan Review satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*Mike Fox*

Inspector

This report is accompanied by an Appendix containing the Main Modifications

## Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strike through~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ paragraph	Main Modification
MM1	43	S3 Implementation section, para 5.41	...and cycling facilities. <del>Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council.</del>
MM2	67	S5 Implementation section, para 5.62	...at Albert Basin. <del>The large Strategic Site at Beckton Riverside will require joint working with TFL on developing options for DLR extensions and a new station, DLR depot and river crossings; and with ELWA constituent boroughs on review of the Joint Waste Plan (see INF3). The Council is</del>
MM3	111	SP4 Implementation section, para 6.46	<i>Break up paragraph as follows:</i>  <i>After '...the qualitative aims of this policy, which public bodies can facilitate.', added new para:</i> <u>6.46a Careful master-planning of a Strategic Site will enable the location of the tallest buildings in any scheme to be placed at key locations. Such key locations may be identified at transport nodes and/or local/town centres effecting a place hierarchy within the site itself. Alternatively, they may relate to the topography and characteristics of the site, and visual design approach e.g. at focal points for vistas. Justification for a tall building at a particular location within a Strategic Site will be required to meet the design, management and technical criteria set out in this policy with reference to the interior of the Strategic Site as well as the wider area, and the meaning of the term 'key' should not be stretched so as to dilute it by applying it to too many locations.</u>  <u>6.46b This has already occurred in the area [...] carefully managed away.</u>
MM4	136	SP8, 2b, xi	avoid unacceptable exposure to light (including light spillage), odour, dust, noise, <u>disturbance</u> , vibration radiation and other...
MM5	146	SP8 Implementation. Para 2.16a	<i>Add following text:</i> <u>In promoting an agent of change approach to new development it is important that consultation should take place with existing operators/occupiers to ensure that new development is deliverable and that the two uses are able to operate alongside each other; not just physical neighbours but</u>

Ref	Page	Policy/ paragraph	Main Modification
			<u>also river, air and highway traffic regulated by the Port of London Authority (PLA), Civic Aviation Authority (CAA) and Transport for London (TfL) who should also be consulted. It is recognised [...]</u>
MM6	149	SP9.3	<p><i>Amend Technical criteria as follows:</i></p> <p>a. In town centres, the need to <del>maintain or contribute to the achievement of the following</del> <u>ensure that:</u></p> <p>i. Within Primary Shopping Frontages (<u>as shown on the Policies Map</u>), 70% of units <u>are</u> in A1 use.</p> <p><u>Note: A unit comprises a single frontage premises in accordance with street naming and numbering.</u></p> <p>ii. <del>At least two-thirds of town centre leisure uses are to be 'Quality leisure' uses. Units in Class D2, A4 or A3 use should therefore account for at least 67% of leisure uses, and Class A5 uses, amusement arcades and betting shops should not account for more than 33%.</del></p> <p>b. In all areas, <del>not resulting in exceeding any of the following definitions of area or linear</del> <u>the need to avoid over-concentrations of specific uses (currently betting shops, takeaways, and nightly-stay hostels) by ensuring that:</u></p> <p><u>Linear concentrations:</u></p> <p>i. <u>No</u> more than two of the same specified uses <u>are</u> adjacent to each other; and</p> <p>ii. <del>or in a row without</del> <u>There is a separation distance of at least two units in other uses between them pairs (or groups if more than two units) in the same specified use (see attached map 'Appropriate Linear Concentrations');</u> <del>or</del></p> <p><u>Area concentrations:</u></p> <p>iii. <del>a site having</del> <u>There are no</u> more than three <del>other</del> premises in the same <u>specified</u> use within 400m <u>of each other; and</u></p> <p>iv. <u>A 400m catchment drawn around a proposed specified use does not (i.e. the presence of three or more than three overlapping with any more than two other catchment areas drawn around</u></p>

Ref	Page	Policy/ paragraph	Main Modification
			<u>existing or proposed units in the same specified use.</u>
MM7	182	J2 Implementation section, para 6.93b	6.93.b.i <u>In <del>and</del> the case of proposed full release to residential (outside strategic sites), release requires robust marketing as per the technical criteria. That is, in relation to smaller windfall sites in lawful employment use (not SIL Release which is linked to Strategic Site allocations and already accounted for in demand and capacity testing) the policy requires a twelve-month period for demand testing to promote redevelopment of underused employment sites whilst helping to identify those that have reasonable employment potential. As per the GLA Land for Industry and Transport SPG the policy ensures that the site has been adequately marketed through commercial agents at a price that reflects market value for industrial use for a reasonable period and offered with potential for redevelopment where this is required to meet the needs of modern industrial users.</u>
MM8	183	J2, Implementation section, paragraph 6.93d	<i>Added new paragraph after 6.93d:</i>  <u>9.93di Employment-led development is defined on the basis that employment needs (including the viable operation of employment generating uses on the site and where relevant, adjacent sites) should be met first in any design, and then other uses such as residential are fitted around it. This will involve a design and market engagement exercise that establishes the optimum quantum and format of employment space (or in some cases supporting utilities infrastructure) that the site can sustain and further design to ensure that other elements of the proposal do not prejudice the viable operation of such uses on the site and where relevant, adjacent sites, but also designing in compatibility with residential and quality place-making. This process should be in conjunction with response to the Managed Transition criteria where appropriate.</u>
MM9	155	H1, Monitoring section, paragraph 6.122	<i>Additional and revised paragraphs as follows.</i>  6.122 Housing Delivery [...]. This will include <u>monitoring of the Council's Housing Trajectory and 5 Year Housing Land Supply, set out in the graph below and informed by the table in para 6.114b above. This will</u> <del>to be and</del> used as the basis .....

Ref	Page	Policy/ paragraph	Main Modification
			<p style="text-align: center;"><b>Housing Trajectory</b></p> <p>Dwellings completed / projected</p> <p>Year/Plan Year</p> <p> <span style="color: yellow;">—</span> Annual Housing Target (Statutory Plan and beyond)  <span style="color: purple;">—</span> Net additional dwellings (annual)  <span style="color: red;">—</span> Managed Delivery Target (annual) </p> <p>6.122b In light of the variations in supply projected over the plan period, the 5 Year Housing Land Supply will be measured through a stepped trajectory with a different target for every 5 year phase of the Plan, as follows:</p>

Page 500

Ref	Page	Policy/ paragraph	Main Modification												
			<table><tr><th><u>Delivery Period</u></th><th><u>Years</u></th><th><u>Annual Delivery Target</u></th></tr><tr><td><u>Short Term</u></td><td><u>2018/19 – 2022/23</u></td><td><u>2752</u></td></tr><tr><td><u>Medium Term</u></td><td><u>2023/24 – 2027/28</u></td><td><u>3956</u></td></tr><tr><td><u>Long Term</u></td><td><u>2028/29 – 2032/33</u></td><td><u>1892</u></td></tr></table>	<u>Delivery Period</u>	<u>Years</u>	<u>Annual Delivery Target</u>	<u>Short Term</u>	<u>2018/19 – 2022/23</u>	<u>2752</u>	<u>Medium Term</u>	<u>2023/24 – 2027/28</u>	<u>3956</u>	<u>Long Term</u>	<u>2028/29 – 2032/33</u>	<u>1892</u>
<u>Delivery Period</u>	<u>Years</u>	<u>Annual Delivery Target</u>													
<u>Short Term</u>	<u>2018/19 – 2022/23</u>	<u>2752</u>													
<u>Medium Term</u>	<u>2023/24 – 2027/28</u>	<u>3956</u>													
<u>Long Term</u>	<u>2028/29 – 2032/33</u>	<u>1892</u>													
MM10	210	H1 Monitoring Section, para 6.122	<p><i>Add new para 6.122b as follows:</i></p> <p><u>Upon publication of the final (Revised) London Plan, if the Local Plan as written is delivering a significant shortfall against updated targets, early review (of housing delivery) will be undertaken.</u></p>												
MM11	15	S1, 3b	<p>The expectation <u>is</u> that <u>Strategic Sites and any major unallocated sites</u> should be masterplanned, with particularly attention to:</p> <p><u>i The successful integration of the scheme with the wider public area, (including the transport network) and compatibility with existing uses;</u></p> <p><u>ii The transition between, and neighbourliness of, different uses both within the site and in relation to adjacent areas, as per policies SP8 and J2;</u></p> <p><u>iii The proposed mix and arrangement of housing types, sizes and tenures, as per policy H1;</u></p> <p><u>iv Strategic sites that should contribute to the Delivery of key strategic links and connections set out in policies S2-6 and INF2, of new local/town centres and multi-functional community facilities (notably schools), public open space and other green infrastructure.</u></p> <p><u>v or to The accommodation of tall buildings as per the strategic approach set out in policy SP4.</u></p> <p><u>vi The need to secure appropriate and proportionate contributions made by individual developments to the infrastructure requirements of the scheme as a whole.</u></p>												
MM12	21	S1, Implementation section, para 5.11a	<p><i>Add new para after 5.11a:</i></p> <p><u>5.11b Masterplanning is expected on all Strategic Sites and other more sizeable windfall sites,</u></p>												



Ref	Page	Policy/ paragraph	Main Modification
			<u>notably those proposing multiple blocks/development platforms and a mix of uses. This will need to ensure no harmful impact on the living conditions of both existing and proposed residential occupiers and on the [multi-] functionality of new and existing spaces, (including workspaces and public open space) and secure integration of building heights, house types (including housing to meet the specialised needs of local residents) and tenures, safe and convenient sustainable transport access, town and local centres and community facilities, green infrastructure including biodiversity net gain as well as between the site and the wider area. Such masterplanning should be the subject of early engagement with the public and other technical stakeholders, as well as consultation on different iterations as details are established. The Council Statement of Community Involvement will be a relevant consideration in formulating a consultation strategy. Through this process it will also be expected that appropriate and proportionate contributions for individual developments to make to the infrastructure requirements of the scheme as a whole are indicated as per INF9 through an iterative process of capacity testing.</u>
MM13	207	H1, Implementation section, para 6.121b	<u>....across all sizes of housing on a site. As per policy S1.3.a, comprehensive development and masterplanning (including associated capacity testing) are the expected vehicles through which such uses are resolved, and to secure appropriate integration of housing typologies and tenures, and overall residential quality.</u>
MM14	221	H3,3b	<i>Add new criterion:</i> [...] <u>iii. In the case of accommodation for (non-nomadic) Gypsies and Travellers that fall outside of the PPTS definition, quality standards should be agreed in consultation representatives of the local gypsy, traveller and travelling showpeople community.</u>
MM15	248	SC1, Justification section, paragraph 6.153j	<i>Add new paragraphs after 6.153j:</i>  <u>6.153k In relation to BREEAM requirements on all major applications (that are not solely residential new build) includes schemes that are for change of use or refurbishment.</u>  <u>6.153l Water efficiency outputs should be provided at application stage to demonstrate compliance with policy requirement 3b, use of Part G's Water Efficiency Calculator (or subsequent updates) is encouraged.</u>
MM16	266	SC4, 2a	<del>Sites of Importance for Nature Conservation (see INF6) and trees subject to TPOs will be protected.</del> <u>Trees subject to TPOs, and European Sites (notably Epping Forest SAC) and other Sites of Importance for Nature Conservation (SINC) (see INF6) will be specifically protected, having regard both to direct and indirect impact pathways.</u>
MM17	267	SC4 3b (v)	<i>Add new para:</i>  <u>v. incorporates, where required, a Habitats Regulations Assessment (and in accordance with the</u>

Ref	Page	Policy/ paragraph	Main Modification
			<u>Strategic Site allocation or policies INF7 or SC5) which considers direct and indirect impact pathways and in-combination and cumulative effects on the Epping Forest SAC.</u>
MM18	269	SC4 after Implementation section, paragraph 6.183a	<p><i>Add new paragraphs after paragraphs 6.183a:</i></p> <p><u>6.183b. The Council will work together under the auspices of Duty to co-operate and generally with Natural England and other authorities* in reasonable proximity to the Epping Forest SAC** to improve the understanding of indirect in-combination and cumulative impacts of development on the SAC (notably in relation to air quality and recreational intensity) and, as necessary, monitor these and work towards a strategic solution, if required. Any HRA required in respect of any development proposal should have regard to the output of this on-going exercise.</u></p> <p><i>Insert footnotes:</i>  <u>**Some of whom are working together under a Memorandum of Understanding entitled Managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation</u></p>
MM19	270	SC4 after Implementation section, paragraph 6.183a	<p><u>6.183c Proposals should take account of the requirements of the Thames River Basin*** Management Plan (see relevant catchment measures) and avoid any deterioration of waterbodies. Wherever possible provisions to enhance water quality should be incorporated. Useful information may be available via Catchment Partnerships**** (Thames21.org) or the Environment Agency's Catchment Data Explorer.*****</u></p> <p><i>Insert footnotes:</i></p> <p>***<a href="https://www.gov.uk/government/collections/river-basin-management-plans-2015#thames-river-basin-district-rbmp:-2015">https://www.gov.uk/government/collections/river-basin-management-plans-2015#thames-river-basin-district-rbmp:-2015</a>  ****<a href="https://www.thames21.org.uk/a-new-approach-to-catchment-management/">https://www.thames21.org.uk/a-new-approach-to-catchment-management/</a>  *****<a href="http://environment.data.gov.uk/catchment-planning/search?type=postcode&amp;q=e16%202qu">http://environment.data.gov.uk/catchment-planning/search?type=postcode&amp;q=e16%202qu</a></p>
MM20	270	SC4 after Implementation section, paragraph 6.183a	<u>6.183d Biodiversity net gain should be delivered within the application site as far as possible. Where this cannot be accommodated for operational or other reasons a payment in lieu to a relevant provider should be established and secured via planning obligation. In the first instance the onus is on the applicant to mitigate the impacts of the proposed development, this development cost should be embedded within delivering a policy compliant scheme. This would include contributions to any necessary mitigation of in-combination significant effects on Epping Forest SAC by way of a 'Strategic Solution' which may emerge from the</u>

Ref	Page	Policy/ paragraph	Main Modification
			<u>investigation work currently underway.</u>
MM21	272	SC5, 3d	<i>Add new technical criteria paragraph after 3d:</i>  <u>e. Developments likely to generate any significant traffic, and hence air quality impacts, on the A12 and A406 (whether alone or in combination with other development) which pass within 200m of the Epping Forest SAC will need to undertake an assessment of impact on the SAC as part of a HRA.</u>
MM22	274	SC5, implementation para 6.185i	<u>Given the conflict between some forms of energy generation and air quality objectives, all developers should refer to the requirements of SC2, ensuring that combustion based energy is employed as a last resort and accompanied by adequate minimisation and mitigation of impacts (including meeting the benchmarks set out in Appendix 7 of the Sustainable Design and Construction SPG). Developments will be expected to focus on energy efficiency and an efficient energy supply before energy solutions known to have negative air quality impacts.</u>
MM23	283	INF1.1b	<u>vi. [...] to Barking and Thamesmead, and new stations at Beckton Riverside and Thames Wharf (T6) and an expanded depot at Beckton Riverside;</u>
MM24	299	INF2, Implementation, paragraph 6.219	<u>...These should include acceptable robust, measured strategies and travel plans for mitigating or minimising adverse impacts, including cumulative impacts on traffic flows in the wider network that may affect air/water quality within 200m of the Epping Forest SAC and highlighted by the defined congestion zones in Newham, through measures to...</u>
MM25	302	INF3, 2b	<u>Development incorporating the Schedule 2 safeguarded site in at Beckton Riverside will include a waste facility with capacity to meet strategic waste needs or unless it is demonstrated that there is no longer a need for a waste use for such a facility in that location (either through proof of updated evidence concerning strategic no need or the availability and suitability of an alternative site via an updated Joint Waste Plan or submission of equivalent robust evidence).</u>
MM26	303	INF3, 3b	<i>Insert new policy criteria after 3b</i>  <u>c. Major development proposals should be accompanied by Site Waste Management Plans setting out how the requirements of this policy are met.</u>
MM27	237	INF3, Implementation, paragraph before 6.233a	<i>Add paragraph before 6.233a in implementation section.</i>  <u>6.233 Schedule 1 and 2 waste sites are currently found within the 2012 Joint Waste Plan though this is likely to be reviewed in the plan period. The policy will remain applicable to any replacement 'Schedule 1' sites (i.e. safeguarded); the updated plan is likely to be called the East London Waste Plan (ELWP). Schedule 2 sites, which reflect capacity to meet strategic waste needs</u>

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			<u>will be revisited by the update; in the meantime should development come forward on that presently identified in Beckton (which falls within the Beckton Riverside Strategic Site S01) the site allocation together with this policy provides for delivery of a strategic waste facility in accordance with the objectives of the Joint Waste Plan Policy W2, directing such development to remaining SIL or requiring the submission of updated evidence that demonstrates that the strategic need is no longer present. This may be due to intensification of capacity elsewhere, changing waste needs and apportionment (including a revised sub-regional distribution) or identification of an alternative site to meet that need.</u>
MM28	313	INF4, 3g	<i>Insert new policy criteria after 3g.</i>  <u>h Development in the vicinity of Beckton STW should undertake an Odour Impact Assessment and respond with appropriate mitigation as necessary as per the guidance cited in policy SP8</u>
MM29	316	INF4, Implementation section, paragraph 6.235f	<i>Add new para after 6.235f</i>  <u>6.235fa To confirm that sufficient capacity exists applicants should liaise with utilities providers as early as possible to determine if an assessment needs to be undertaken. In the case of water and waste water it is expected that the impact of development both on and off-site is considered. In some instances it may be necessary to undertake appraisals to determine if a proposal will lead to overloading of existing water or waste water infrastructure. In the absence of detailed design and phasing details, planning permission for developments which result in the need for off-site water/wastewater infrastructure upgrades may be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.</u>
MM30	317	INF4 6.235h	<i>Add implementation paragraph after 6.235h and 6.235i (above)</i>  <u>6.0235j: As per the IDP, the GLA are working with electricity infrastructure providers to resolve the pressing need for capacity upgrades to meet growing demand in the Royal Docks and Beckton. A site search, focusing on land within the GLA portfolio with minimum spatial impact is being undertaken with provisional targeting of further work on Albert Basin and Thames Wharf. This policy seeks to work within the context of that work, which in turn is consistent with its principles, though will need to be tested also against other relevant policies in the plan.</u>
MM31	327	INF5, Implementation section, paragraph 6.253a	<u>The Council's <del>2016</del> borough-wide Town Centre and Retail Study <del>and capacity projections</del>, is the latest evidence base which considers capacity projections although that capacity is likely to have changed in the meantime given the scale of population growth arising from new Strategic Sites, plan objectives to increase trade retention, and rapidly changing retail behaviour. We would expect proposals to respond to it (or any <del>together with updates</del>) is a key tool in respect of this</u>

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			<p>strategy, and we would expect proposals to respond to it, using the figures* and updated monitoring of commitments, and/or [particularly when the proposal is defined as Major as per the GDPO] reconciling their own borough-wide modelling with them. Developers will be expected to consider the relationship between the hierarchy of existing and proposed [town] centres and the catchments they serve. Retail impact assessment will be required where proposals differ significantly from the qualitative and quantitative parameters set out in the site allocations and spatial policies which are founded on this evidence base and its more detailed 2010 equivalent. Centre size and other benchmarks are defined broadly as per the London Plan in the glossary.</p> <p><u>*Summary Table of Projections convenience/comparison at 5 year intervals:</u></p> <table> <tr> <th>Convenience Goods Floorspace</th><th>2020 (sq m net)</th><th>2025 (sq m net)</th><th>2030 (sq m net)</th></tr> <tr> <td>Global Capacity</td><td>3,479</td><td>7,879</td><td>10,632</td></tr> <tr> <td>North-west (Stratford)</td><td>2,338</td><td>4,420</td><td>5,738</td></tr> <tr> <td>North-east (Forest Gate)</td><td>38</td><td>81</td><td>88</td></tr> <tr> <td>South-west (Canning Town)</td><td>121</td><td>253</td><td>316</td></tr> <tr> <td>South-east (East Ham, Green Street and Beckton)</td><td>982</td><td>3,126</td><td>4,489</td></tr> </table> <table> <tr> <th>Comparison Goods Floorspace</th><th>2020 (sq m net)</th><th>2025 (sq m net)</th><th>2030 (sq m net)</th></tr> <tr> <td>Global Capacity</td><td>25,904</td><td>65,907</td><td>110,325</td></tr> <tr> <td>North-west (Stratford)</td><td>20,371</td><td>52,392</td><td>87,369</td></tr> <tr> <td>North-east (Forest Gate)</td><td>195</td><td>535</td><td>890</td></tr> <tr> <td>South-west (Canning Town)</td><td>62</td><td>136</td><td>219</td></tr> <tr> <td>South-east (East Ham, Green Street and Beckton)</td><td>5,276</td><td>12,844</td><td>21,848</td></tr> </table> <p>6.253ai Reference to 'proximate centres' is intended to encourage consideration of impacts beyond Newham's boundaries where relevant, whilst the criterion also highlights that within centre (particularly spatial) impacts must still be addressed even if the development accords with other aspects of the strategy. [...] The likelihood of new floorspace being unlet and presenting as a void due to <u>lack of evidence of market testing</u> <del>its speculative nature</del> will also be a spatial impact consideration, as per SP3 and J1.</p>	Convenience Goods Floorspace	2020 (sq m net)	2025 (sq m net)	2030 (sq m net)	Global Capacity	3,479	7,879	10,632	North-west (Stratford)	2,338	4,420	5,738	North-east (Forest Gate)	38	81	88	South-west (Canning Town)	121	253	316	South-east (East Ham, Green Street and Beckton)	982	3,126	4,489	Comparison Goods Floorspace	2020 (sq m net)	2025 (sq m net)	2030 (sq m net)	Global Capacity	25,904	65,907	110,325	North-west (Stratford)	20,371	52,392	87,369	North-east (Forest Gate)	195	535	890	South-west (Canning Town)	62	136	219	South-east (East Ham, Green Street and Beckton)	5,276	12,844	21,848
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MM32	341	INF7, 3e	Insert new policy criteria after 3e  <u>f. Developments within 6.2km of the Epping Forest SAC with the potential to give rise to significant recreational disturbance impacts (bearing in mind likely travel routes) should undertake an assessment of impact on the SAC.</u>
MM33	347	INF7, Implementation, paragraph 6.272c	<i>Add new paragraph after 6.272c:</i>  <u>6.272c.i The availability of current or additional local recreational opportunities, may also be relevant in assessment of any likelihood of recreational green space demand impact on Epping Forest SAC. The need for HRA screening in relation to potential impacts on the SAC is signposted as relevant within the Strategic Site schedule (Appendix 1, 'constraints and other advisory information'). Whilst the requirement for an HRA is not generally considered relevant to sites of lesser scale, whether or not such an assessment is required for Major schemes should be the subject of pre-application discussion with the Local Planning Authority.</u>
MM34	395, 401, 370, 377, 375, 372, 391, 384, 398, 399, 400, 402, 372	Strategic Sites, Further Sources of Information' and 'Constraints and Other Advisory Information' sections: Beckton Riverside (S01), East Ham Western Gateway (S03), North Woolwich Gateway (S04), Stratford Central (S05), Central Thameside West (S07), Silvertown Landing (S09), Abbey Mills (S10), Parcellforce (S11), Canning Town Riverside (S12), Canning Town Central (S14), Woodgrange Road West (S24), East Ham Market (S25), East Ham Town Hall Campus (S26), Queen's	<i>Under 'Constraints and Other Advisory Information' section of these sites add:</i>  <ul style="list-style-type: none"> <li><u>Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;</u></li> </ul>

Ref	Page	Policy/ paragraph	Main Modification
		Market (S27) and Plaistow North (S29)	
MM35			<i>No MM</i>
MM36	381	Strategic Site, Thames Wharf (S08), 'Allocation Including Tall Buildings Specifications' section	<del>Proposed</del> [...] This and Managed Release from SIL (see Policy J2) <del>could</del> will provide the opportunity [...] Indicative building heights of <del>6 to 8</del> <u>10 to 12</u> storeys with buildings of up to <del>15</del> <u>18</u> storeys at key locations.
MM37	375	Strategic Site, Silvertown Landing (S09), 'Allocation Including Tall Buildings Specifications' section	Mixed use consolidating the community centred on the new DLR station at Thames Wharf on the western part of the site through Managed Release of SIL, and <u>employment/strategic infrastructure development at the east of the site, where the functionality and capacity of the SIL will be protected securing buffering of both new and existing SIL and strategic infrastructure with possible scope for further limited release via Managed Intensification as per J2.. consolidation and strengthening of the SIL on the eastern side of the site and beyond through continued SIL protection, together with strategic infrastructure.</u> Employment [...] demand. The Managed Release of the western part of the site for mixed use will secure an appropriate transition from SIL <u>and strategic infrastructure</u> and include residential uses [...] Indicative building heights <del>6 to 8</del> <u>10 to 12</u> storeys <u>with</u> buildings of up to <del>15</del> <u>18</u> storeys being acceptable at key locations. <del>ensuring that views of and the pre-eminence of the distinctive Marco Polo building at Royal Wharf are protected.</del> [...] See also policies..... SP8
MM38			<i>No MM</i>
MM39	382	Strategic Site, Parcellforce (S11),	Employment-led mixed use (linking to existing Cody Road industrial uses) that contributes to the creation of <u>a new neighbourhood and of a new local centre in the vicinity of West Ham station and integration of the protected historic gasholders,</u> along with delivery of riverside open space. <u>Proposals will require an assessment of and an appropriate viable strategy for the Grade II listed gasholders. This should take into account the impacts on the significance of the gasholders, including any effects on setting, recognise their role as heritage and character assets and their potential contribution to place making. ...</u>
MM40			<i>No MM</i>
MM41			<i>No MM</i>
MM42	378	Strategic Site, Lyle park West (S20), 'Allocation Including	[...] Indicative heights <del>6 to 8</del> <u>10 to 12</u> storeys and up to <del>15</del> <u>18</u> storeys at key locations including West Silvertown DLR station. <del>ensuring that views of and the pre-eminence of the distinctive</del>



Ref	Page	Policy/ paragraph	Main Modification
		Tall Buildings Specifications' section	<del>Marco Polo building at Royal Wharf are protected. [...]</del>
MM43	398	Strategic Site, Woodgrange Road West (S24), 'Allocation Including Tall Buildings Specifications' section	Indicative heights: 4-6 storeys <del>overall</del> with scope for mid-rise development of up to a maximum of 8 storeys in the vicinity of the <del>with sensitivity to the town centre Conservation Area; scope for a taller building of up to 19 storeys immediately adjacent to the station.</del>
MM44		<u>Glossary</u> [New] Agent of Change	<b>Agent of Change Principle:</b> Denotes that it is the responsibility of any new development (i.e. the agent of change) seeking to locate to an area, to mitigate any adverse impacts from any existing uses. This is to ensure that occupants of the new development are protected from adverse impacts and existing uses are protected from complaint. Similarly, any new development likely to generate adverse impacts (for example a music venue) would need under the principle, to put in place measures to mitigate impacts on any existing development close by.
MM45		<u>Glossary</u> [New] Arc of Opportunity	<b>Arc of Opportunity:</b> The stretch of land from Stratford and the Olympic Park, down the Lower Lea Valley and east through the Royal Docks to Beckton (see Spatial Portrait Map). Historically a primarily industrial area, it has undergone much change in the economy after decades of public investment in land assembly, remediation, and infrastructure development, including under the auspice of the Olympic and Paralympic Games in 2012. Large scale transformational change is ongoing, contributing to the area becoming more mixed use and densely developed, or in effect, urbanising relative to what elsewhere in the borough increasingly seems suburban.
MM46		<u>Glossary</u> [New] Co-location	<b>Co-location:</b> is a type of mixed use whereby the construction of industrial and warehousing floorspace and residential floorspace occurs on the same site, either horizontally (side by side) or vertically (residential uses on top of the industrial or warehousing).
MM47		<u>Glossary</u> New] Good Growth	<b>Good Growth:</b> Growth (and development) that is socially, economically and environmentally sustainable, whereby growth: <ul style="list-style-type: none"> <li>• <u>in housing numbers and population is balanced against that of the infrastructure and jobs needed to support it;</u></li> <li>• <u>is not at the expense of the environment / resources;</u></li> <li>• <u>does not result in compromises in quality; and</u></li> <li>• <u>is optimised in relation to strengths and opportunities, for the benefit of new and existing residents.</u></li> </ul> <u>Good Growth forms the overarching Objective 3 of this plan, and is established in policy by S1 1c).</u>
MM48		<u>Glossary</u> [New] Integrated Impact Assessment	<b>Integrated Impact Assessment (IIA):</b> addresses all of the Council's legal duties to carry out impact assessments of a plan within one integrated process. It fulfils statutory requirements for the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and incorporates

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			<u>the requirements for Health Impact Assessment, Equalities Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA). Integrating the assessments in this way ensures a comprehensive approach that informs the development of plan policies. As many of the issues considered in the assessments overlap in practice, an integrated approach is thought to produce better recommendations and outcomes. The IIA is an iterative process that considers the impacts of emerging policies and proposes alterations to them or mitigation for any adverse impacts that may be identified. The IIA can be found on the Council's website.</u>
MM49		<u>Glossary</u> Local Mixed Use Area	<b>Local Mixed Use Areas</b> (LMUAs, see J2 2c): <del>Existing or former local employment locations which largely contain under-occupied premises and underused land within a poorer quality environment. Overall they comprise a broad range of uses falling within A, B, D and C3 Use Classes. Areas in which employment-led mixed use is promoted as part of the Managed Transition towards a genuinely mixed use borough through the protection of Class B1 and other employment-generating uses. Development should follow Managed Transition principles (see definition below) whilst securing environmental enhancements and compatibility with residential uses.</del>
MM50		<u>Glossary</u> [New] Managed Intensification	<b>Managed Intensification:</b> <u>is the [conditional] process of intensifying employment uses on identified areas of designated employment land, in accordance with the criteria in policy J2:3b, such that capacity is increased but the spatial footprint or spatial impact of employment land is reduced (ensuring no net loss of functionality), as part of a plan-led and managed approach to employment land that supports economic growth.</u>
MM51	357	<u>Glossary</u> [New] Managed Release	<b>Managed Release:</b> <u>is the [conditional] process of releasing identified areas of designated employment land for redevelopment to other uses typically including residential, in accordance with the criteria in policy J2:3a, as part of a plan-led and managed approach to employment land that supports economic growth.</u>
MM52	358	<u>Glossary</u> [New] Managed Transition	<b>Managed Transition:</b> <u>is the [conditional] process of managing the spatial and temporal/process transition of identified areas of designated employment land to 'lighter' employment generating uses (often from more traditional heavier industries) that are more compatible with residential development, in accordance with the criteria in policy J2:3a, as part of creating a mixed use borough and the securing of employment land that is better aligned with contemporary business needs.</u>
MM53		<u>Glossary</u> Retail Hierarchy	<b>Retail Hierarchy:</b> An interrelated network and hierarchy of retail and associated service provision. In Newham, <u>broadly as per the London Plan definitions</u> , this comprises: <ul style="list-style-type: none"> <li>- Town Centres: Defined area which may be a successful economic places or destinations in their own right containing town centre uses. This is the collective term for:</li> </ul>

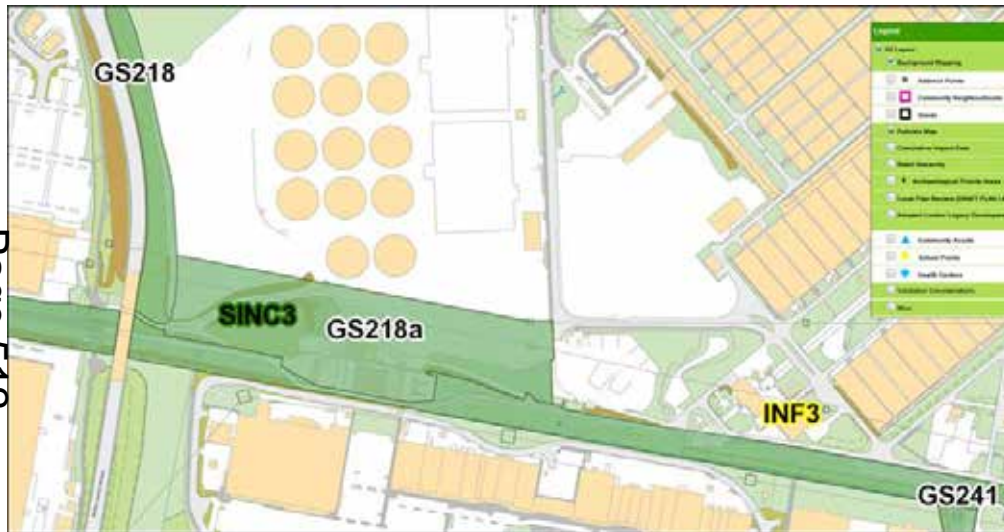
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			<ul style="list-style-type: none"> <li>· <u>International Centre, defined as: London's globally renowned retail destinations with a wide range of high-order comparison and specialist shopping with excellent levels of public transport accessibility.</u></li> <li>· <u>Metropolitan Centre (Stratford), defined as:—serving wide catchments which can extend over several boroughs and into parts of the wider South East region; typically containing at least 100,000 sq.m of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods; and generally having very good accessibility and significant employment, service and leisure functions.</u></li> <li>· <u>Major Centre (East Ham), defined as: having a borough-wide catchment and typically containing over 50,000 sq.m of retail, leisure and service floorspace with a relatively high proportion of comparison relative to convenience goods; they may also have significant employment, leisure, service and civic functions.</u></li> <li>· <u>District Centre (Canning Town, Forest Gate, Green Street and East Beckton), defined as: providing convenience goods and services for more local communities and accessible by public transport, walking and cycling; typically containing 10,000 – 50,000 sq.m of retail, leisure and service floorspace; with potential for specialist shopping functions in some cases.</u></li> <li>- <u>Local Centres, defined as: <del>An accessible area of shops and services which perform a local shopping and service role.</del> typically serve a localised catchment often most accessible by walking and cycling, and comprise mostly convenience retail (including potentially a small supermarket of around 500 sq m) and other services. In Newham they average 4650 sq m.</u></li> <li>- <u>Local Shopping Parades: Small groups of shops (three or more units).</u></li> </ul>
MM54			<i>No MM</i>
MM55	374	Strategic Site, Minoco Wharf (S22), Allocation including tall buildings specifications	...heights: <del>6 to 8</del> <u>10 to 12</u> storeys and up to <del>45</del> <u>18</u> storeys at key locations
MM56	313	INF4.3.g	...utilities connection requirements, <u>and be designed to accommodate access and safety considerations in relation to key utilities infrastructure including high voltage cabling.</u>

MF 15 November 2018

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## Modification 368

Previously:

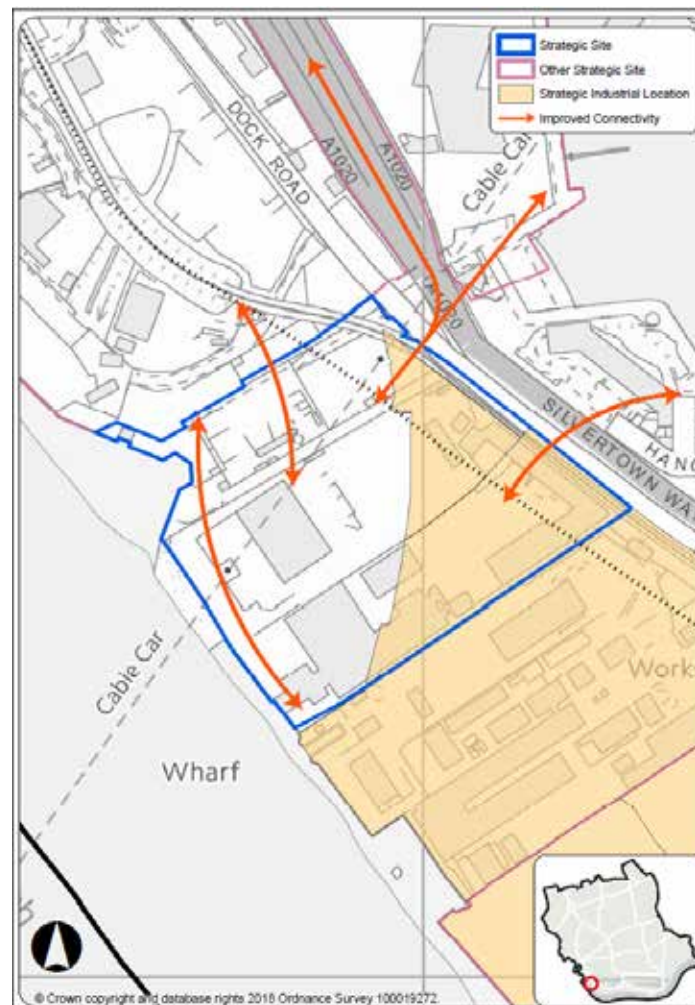
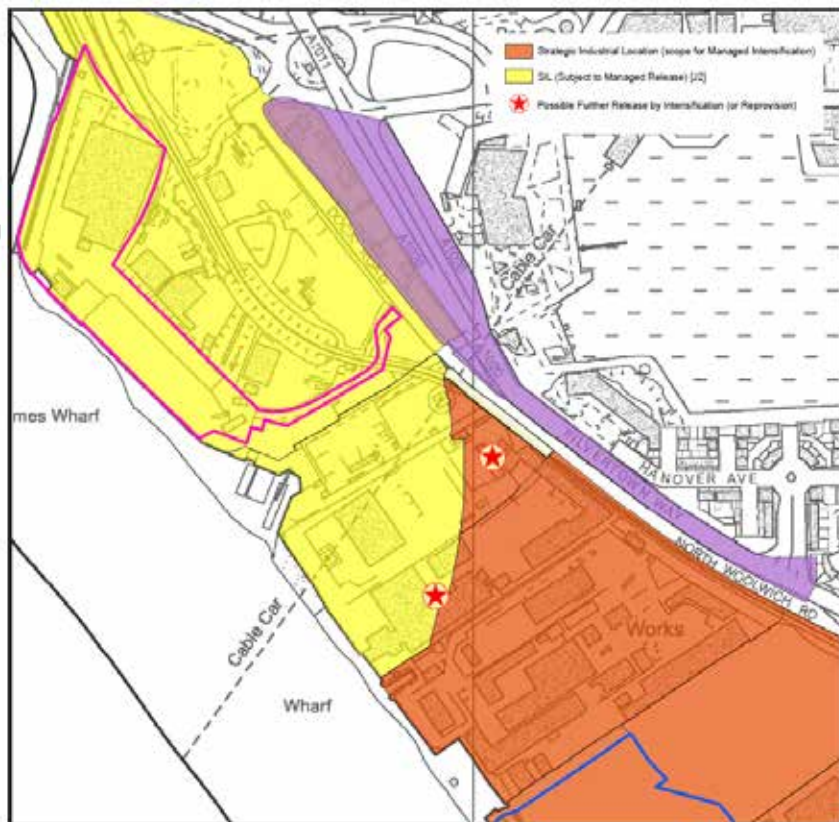


Amended:



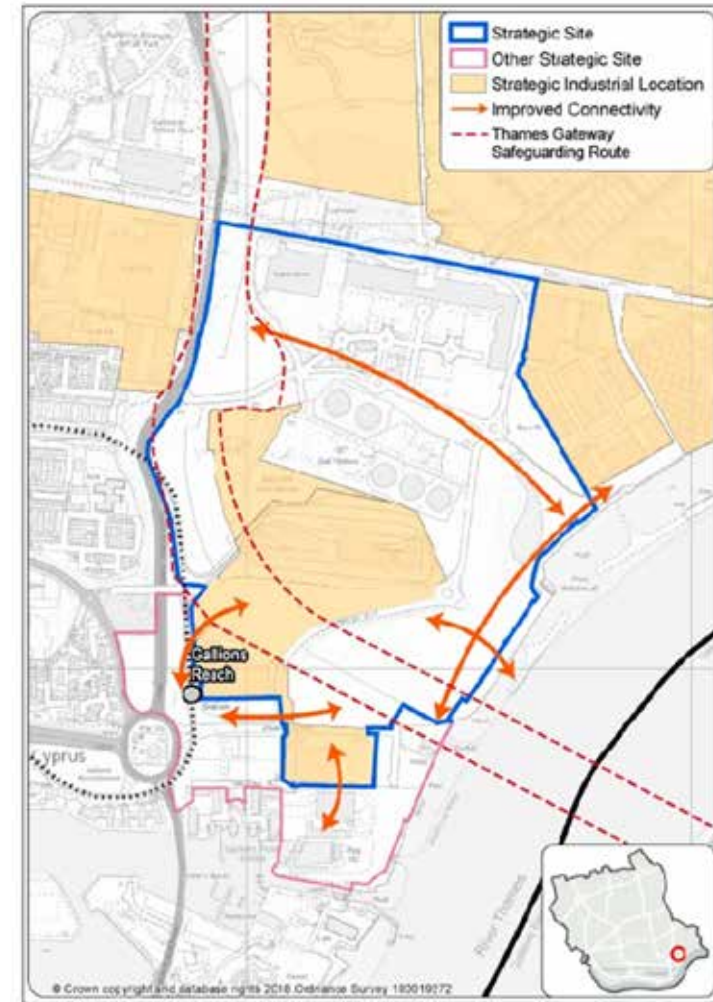
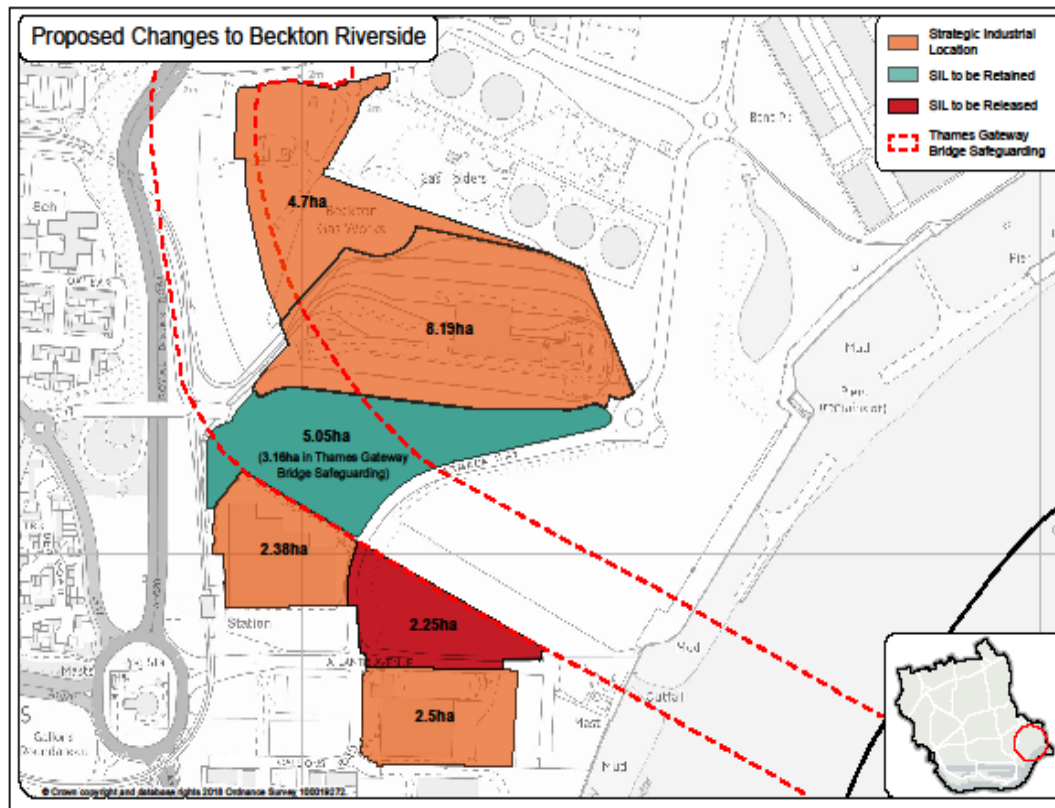
## Modification 314

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## Modification 300





## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	<b>Uniting and supporting Newham schools: the next steps</b>	
<b>Date of Meeting</b>	<b>4 December 2018</b>	
<b>Lead Officer and contact details</b>	<b>Peter Gibb</b> Job Title: Head of Education Access and Infrastructure External Telephone Number: 020 3373 3144 E-mail Address: <a href="mailto:peter.gibb@newham.gov.uk">peter.gibb@newham.gov.uk</a>	
<b>Director</b>	<b>Grainne Siggins</b> Job Title: Executive Director Strategic Commissioning External Telephone Number: 020 3373 8035 E-mail Address: <a href="mailto:grainne.siggins@newham.gov.uk">grainne.siggins@newham.gov.uk</a>	
<b>Lead Member</b>	<b>Councillor Julianne Marriott, Cabinet Member for Education</b>	
<b>Key Decision?</b>	Yes	Reasons: Affects all wards in the borough
<b>Exempt information &amp; Grounds</b>	No	Grounds:
<b>Wards Affected</b>	All	
<b>Appendices (if any)</b>	Appendix 1 – Stakeholder engagement Appendix 2 – Summary of feedback from Partnership event for Newham maintained schools, 28 September Appendix 3 – Newham Education Partnership Board - Terms of Reference Appendix 4 – Potential content of school improvement focused support offer	

#### 1 Executive Summary

1.1 The Mayor, in her successful election campaign, pledged to:

- 1.1.1 re-establish a sustainable partnership with teachers, governors, parents and pupils to unite the family of Newham schools, and involve them in decisions about education;
- 1.1.2 oppose further academisation and support schools to remain within the local authority

1.2 In July the Executive adopted the policy to support Newham's maintained schools to maintain their current status. Since this decision, the Cabinet

Member for Education and officers have worked closely with schools and other partners to develop proposals to build on Newham's excellent education offer and ensure that we work together to sustain these achievements and provide even better outcomes for all our children and young people. This work has been informed by discussions with headteachers, governors, parents, young people, elected members and unions.

1.3 For both of the above pledges, this report details:

- 1.3.1 the steps taken to develop a partnership with all schools and education providers, with a focus on working together to: enable schools to be even better at preparing our children for adult life; and resolve issues of shared concern including support for special educational needs and disability (SEND) and safeguarding;
- 1.3.2 proposals for providing enhanced support structures for school improvement jointly funded between the Council and schools, with the aim of launching an initial offer by September 2019. This work is based on the needs expressed by Newham's maintained schools and targeted at supporting them to stay maintained. This offer will not be restricted to maintained schools and may be relevant particularly to smaller multi-academy trusts (MATs) where additional support is needed.

## **2 Recommendations**

2.1 For the reasons set out in the report and its appendices, Cabinet is recommended to agree the following:

- 2.1.1 To note progress in developing a partnership with all schools and education providers including the establishment of an Education Partnership Board and early work to address key concerns.
- 2.1.2 To note progress made in reviewing existing models of improving school improvement structures and outlining proposals for Newham.
- 2.1.3 To note that final costed proposals for a sustainable and effective school improvement focused partnership will be brought back to Cabinet by April 2019 following further discussions with both maintained schools and academies.

## **3 Background**

3.1 Key principles underpinning proposals in this paper:

- Collective responsibility of all partners, schools and the Council to improving outcomes for all our children and young people, including the most vulnerable.
- Consultation with education providers and other stakeholders in decision making about the future of education.
- Transparency of data, including on educational attainment, admissions, exclusions, special needs and disability, resources and finances.

- The voice of children, young people, parents is central, alongside teachers, other staff in schools and governors.
  - School improvement is most effective when schools support each other through sharing of effective practice and peer support.
  - Maintained schools should be able to access at least as effective support as schools in a multi academy trust (MAT).
- 3.2 The Mayor, following consultation with Cabinet asked officers to identify and review existing models of supporting schools with the intention of making proposals for a sustainable and effective partnership with schools to be brought to Cabinet in December 2018.
- 3.3 The proposals build on the strong performance of Newham's children and young people and educational providers, including in both maintained schools and academies. The most recent results from summer 2018 show that Newham is ranked above or well above national averages on a range of measures including the Early Years Foundation Stage, the year one phonics screening check, key stage one and key stage two expected levels for reading, writing and mathematics, GCSE results (attainment and progress), Level 3 and A-level results. Some Newham schools remain among the best in the country for pupil progress and attainment.
- 3.4 Newham schools also support their students to achieve excellence in a range of other skills and attributes that are crucial in preparing for adult life and work, such as contributing to the life of the school, supporting the local community, and other enriching experiences. We will consider how to evidence these wider outcomes in future.
- 3.5 The Council has engaged with governing bodies, parent and young people forums and hosted events with head teachers to seek their views on how to improve partnership arrangements between schools and the Council. A summary of stakeholder engagement is at **Appendix 1**. There has been rich and varied discussion and a high level of involvement from all parties in seeking to achieve the best possible outcomes for our children and young people. Specific engagement has included:
- 3.5.1 The Cabinet Member for Education and senior education officers have attended the governing bodies of over 30 maintained schools to hear their views on how the Council can improve its support to them.
  - 3.5.2 Meeting with National Leaders of Education (NLEs), 12 September
  - 3.5.3 Governors Forum, 13 September
  - 3.5.4 Newham Partnership Working (NPW) Board, 20 September
  - 3.5.5 Elected Members' away-day, 21 September
  - 3.5.6 An event on 28 September for maintained schools attended by headteachers from 36 schools (over 80% of maintained primary and

secondary schools) followed by a smaller working group on 30 October and 23 November

3.5.7 Attendance at three School Council meetings with young people

3.5.8 Meeting with parent governors from maintained school and academies, 12 November

3.5.9 Discussion with representatives of teaching unions, 16 November

#### Feedback

3.6 The Council facilitated conference for maintained schools on 28 September heard from existing successful partnerships both inside and outside of Newham, and discussed the present support from the Council for Newham maintained schools and how it could be improved. The key themes from head teacher feedback at the conference is provided in **Appendix 2**.

3.7 Head teachers at the conference wanted any additional or new offer from the Council to focus primarily on school improvement, alongside support to achieve financial savings for example through bulk buying. They felt that this should include revisiting the present in-house school improvement offer. Schools want the Council to create links between present school networks and local partnerships to make sure all schools have local support and can access the very successful practices already in place within local schools.

3.8 Many schools have welcomed the new administration's approach to engage openly with schools; however there is a genuine sense of impatience and frustration as they want to see changes happen quickly. These include implementing changes needed and identified by previous reviews to make the Council's core services more effective and to improve the quality assurance processes.

3.9 Lack of trust has been mentioned many times and building trust is essential to the success of the education partnership. The Council has begun the process of earning the trust of more schools through: demonstrating better communication between its services; more consultative decision making; improved signposting to the most relevant support; publishing expectations of its present services and sharing more data about services and local needs such as SEND.

3.10 Key points raised by parents, children and young people included:

3.10.1 Both pupils and parents emphasised the importance of balancing the pursuit of strong academic results with a broad and balanced education which prepares children and young people for life and work.

3.10.2 The need for employers to work with schools including meaningful work experience and careers guidance.

3.10.3 Being 'prepared for tomorrow' i.e. children being ready for technological and social changes that are likely to affect their adult life.

3.10.4 The importance of behaviour management to the effective running of schools.

3.10.5 The need for a safe school environment.

3.10.6 A desire to be happy and have a love for learning.

- 3.11 It is important we continue to seek feedback from all stakeholders including parents, children and young people, alongside teachers, other staff in schools and governors to ensure their voice is heard and can influence decision making. Further work is needed to enable this.

## **4 Key considerations and Proposals**

### **4.1 Partnership with all schools and education providers**

- 4.2 Discussions with all schools and other education providers indicate that they wish to see the Council committed to an ongoing partnership through a new Partnership Board. Schools view this forum as a mechanism which will enable them to have a key role in influencing decisions about education. The Board represents education providers but will importantly take advice from other key stakeholders including parents, young people and governors.
- 4.3 In July the Council established a shadow Education Partnership Board with head teachers (maintained and academy) nominated by the Newham Association of Primary Headteachers (NAPH) and Newham Association of Secondary Headteachers (NASH). The shadow Board met three times and agreed terms of reference – see **Appendix 3**. In November the full Board met and also included a representative from early years providers. A post 16 provider representative has been identified and will join the Board in the New Year.
- 4.4 The first few meetings have been constructive and welcomed as they have brought greater transparency regarding a variety of data. The Board's purpose is to advise and consult with key partners on strategic direction and educational performance, as part of an ongoing dialogue on the future of education. The Board will use its knowledge and expertise to interrogate data, challenge present performance, identify performance challenges, propose key priorities and suggest ways for sharing effective practice and achieving improvements.
- 4.5 The (shadow) Board has discussed the following priority items (minutes are available at <http://newhamconnect.uk/Article/59389>) :
- 4.5.1 The greatest concern from across all sectors relates to issues with special educational needs and disability (SEND) services; and how we are developing early help/safeguarding to address current concerns and build confidence. The Board has discussed these concerns with officers, including a review of data on SEND and a discussion about the bid to DfE for a special school.
- 4.5.2 Reviewing Newham's educational data on Newham's schools and children. Future discussions will look at why some schools/providers are performing less well than others and other key data such as exclusions.

- 4.6 A key priority expressed by many schools is that the Council needs to 'get the basics right' on core services to schools where currently levels of trust and confidence are low (especially for SEND including Education, Health and Care plans). Following discussions at the Board, the Council has begun work on agreeing with schools a new professional services guarantee for all Council services to schools (statutory services and traded services) to include:
- A clear and comprehensive statement of what the Council will provide in one place (a development of our existing Newham Connect website)
  - Minimum service standards – for example maximum timescales for responding to queries
  - Clearly advertised routes for escalating concerns and complaints
- 4.7 **School improvement partnership – proposals**
- 4.8 Feedback from maintained schools demonstrates a clear case for developing support structures jointly funded between schools and the Council so they can be even better at preparing our children and young people for adulthood, and be ready for future challenges. This is supported by discussions with schools, governors and learning from other local authorities.
- 4.9 The maintained headteacher working group has been clear that this support must be underpinned by a clear set of values. They have suggested:
- Collaboration must be at the heart of all we do.
  - Democratic representation is essential – schools are represented individually per school irrespective of any other partnership or status.
  - 'Children and Young People First' is the driving factor in all actions.
  - Holistic education drives our agenda.
  - Wellbeing for all stakeholders is invested in at all levels.
- 4.10 These proposals need to work with the existing partnership of Newham schools – Newham Partnership Working (NPW). NPW provides business and school support services (such as HR, governor, ICT, finance and health and safety support) to schools (maintained and academy) which choose to buy these services. NPW is a mutual organisation set up and owned by Newham schools.
- 4.11 As outlined elsewhere in this paper, much of the Council's partnership working is with all schools. This initial proposal is based on meeting the school improvement needs identified by maintained schools, some of which have felt isolated and lacking support. The offer will also be made to academies (including free schools). This may apply particularly to smaller MATs where additional support is needed. We will be engaging further with maintained schools and academies on the final proposal.
- 4.12 Progress in this area is dependent on the full support and commitment of a large number of maintained schools and therefore it is vital to have secured their support before proposals are finalised. Proposals would need to build on

existing partnerships between schools in some parts of the borough which have already made significant progress. This includes considering the relationship with the Teaching Schools offer.

- 4.13 The initial focus of the proposals is school improvement as this is very much the priority identified by schools to support them in securing the best possible outcomes for children and young people. The learning from other local authorities is that this partnership should start small and build up over time. A comprehensive partnership is likely to take at least two years to fully establish.
- 4.14 The initial offer could include: tailored challenge and support to each school supported by a data analysis pack; brokerage of peer support networks between schools; network meetings with expert speakers to share good practice and keep up to date with curriculum areas; professional learning opportunities for teachers and leaders; support during and after inspection; and telephone advice and support. **A fuller list of potential content which is based on discussions with maintained school headteachers and governors is provided at Appendix 4.**
- 4.15 Once established the partnership could extend its scope to solve other areas of mutual concern such as the recruitment and retention of teachers (including supply teachers) and securing of funding from grants and other sources. Feedback from schools is that a partnership should include a dedicated post to write bids and secure grant funding on behalf of participating schools.
- 4.16 The first stage in developing a partnership could be to start with an 'in house' offer co-ordinated within the Council, possibly moving to an arm's length or independently managed partnership in the future. **The aim is for an initial offer to launch in September 2019.** More work is needed in the coming months to agree the precise content and test how many schools are willing to contribute financially. Governance arrangements would be established to ensure that headteachers drive decision making about the offer. A further Cabinet Paper will be required for the April Cabinet to agree the final proposal.

#### Options for a school improvement focused partnership

- 4.17 All options below depend on the Council addressing issues with core statutory services for all schools, particularly relating to SEND. Schools have been clear that a new partnership will only succeed if the Council 'gets the basics right' on these issues of key importance for supporting our children and young people. The options below are not mutually exclusive, for example option two could follow from option one over time.
- 4.18 **Option 1 – A new school improvement offer, facilitated by the LA 'in house' and governed with schools**
  - 4.18.1 Under this option, delivery of the offer would be facilitated by the LA and not established as an independent partnership. However governance and decision making would need to be led by schools to ensure schools have ownership and control over the support offer.



- 4.18.2 The advantage of an 'in house' offer is that it could be established more quickly than an independent partnership, as it would use existing LA systems and resources.
- 4.18.3 A governance board of headteachers would need to be established to set priorities for the school improvement offer and determine expenditure to ensure it meets the needs of schools. A fuller list of potential content is outlined at Appendix 4.
- 4.18.4 Feedback from maintained schools is that the offer would need to be clearly described, so that schools know exactly what services they are receiving in return for a financial contribution.

#### **4.19 Option 2 – Arm's length partnership**

- 4.19.1 This could be a development following option one. Whilst this would take longer to establish as a separate entity (the experience of existing partnerships such as Tower Hamlets and Camden suggests at least two years), it would have the credibility of not being managed within Council structures and more fully led by school representatives. The Council would be a partner in the arrangement and would want to be fully involved.
- 4.19.2 The attraction to some schools of this approach is greater permanence of a support offer.
- 4.19.3 Feedback from maintained schools is that the offer would need to be clearly described, so that schools know exactly what services they are receiving in return for a financial contribution.

#### **4.20 Option 3 – Remain 'as is' and identify ways to enhance existing support**

- 4.20.1 Currently school improvement is provided through a commissioned team of 11 School Improvement Advisers from the Kaizen Teaching School to work with schools (both maintained and academies) to ensure sustained and continued improvements in education, including for pupils with special education and higher needs, and to meet its statutory duties. Maintained schools receive an enhanced offer of support, with lower performing maintained schools receiving the most support. Funding is limited at £70k per year meaning most maintained schools receive no more than one day per term of support.
- 4.20.2 Based on feedback from maintained schools this will not be sufficient to meet their needs and allow maintained schools to access the support they need in the maintained sector.

#### **4.21 Options one and two are highlighted for further development and discussion with schools before a final proposal is brought back to Cabinet.**

## 4.22 Costs and Funding Models

4.23 Research of how similar partnerships have flourished in other local authorities shows that there are a number of different funding models that could be adopted (and which could be used to fund options one or two above). All identified partnerships involving a local authority have a financial commitment from the Council as well as schools and involve both maintained schools and academies. The range of options includes:

4.23.1 **Wholly funded by the Council supplementing the core statutory school improvement offer.** Schools contributing staff time and other resources rather than funds. Wigan operates a model along these lines with the Council providing £200k to school managed boards as well as other infrastructure support.

4.23.2 **Seed funded by the Council for a fixed period of 2-5 years to establish networks and practices.** Camden has provided £1.7million per annum partially through seconding staff but also committed additional funds to a much wider range of functions including public health and mental health services. In addition Camden Learning (the school improvement entity) receives a further £400k through services in kind.

4.23.3 **Matched funding with schools and the Council both making equal contributions.**

4.23.4 **A combination of seed funding from the Council and matched funding from schools.** Tower Hamlets Education Partnership operates this model with schools providing £5 per pupil on roll. The Council has agreed to match this for three years, during which they are reviewing the funding system to establish a sustainable model with less Council resource.

4.24 The contribution from schools in other local authorities is usually through a subscription scheme. There are a number of different ways in which subscriptions could operate and it will be crucial to explore all possibilities with schools over the coming months. An alternative to the example above used by Tower Hamlets is a banded model based on school size. Schools would change their subscription each year should their pupil numbers move into a different band.

4.25 Further discussions with maintained schools and academies early in the New Year will establish which of the above funding models is most appropriate before final, fully costed proposals are brought back to Cabinet. Illustrative costings are provided in the financial implications section of the paper.

## 5 Policy Implications & Corporate Priorities

5.1 These outline proposals support the policies of the Mayor and administration

both to support maintained schools, and to re-establish a sustainable partnership with teachers, governors, parents and pupils to unite the family of Newham schools, and involve them in decisions about education. By putting in place support and partnership arrangements, these proposals will contribute to sustained and continued improvements in educational performance and outcomes for our children and young people, and give them the best possible start in life.

- 5.2 All publicly funded schools are facing a period of reducing budgets and increased demands. Although there is currently the protection of a minimum funding guarantee, the introduction of the 'hard' National Funding Formula (expected from 2021) will adversely affect all London schools' budget shares as resources are redistributed.
- 5.3 Schools and the local authority will need to work supportively and collaboratively to make the most efficient use of their resources through, for example efficient contract management or pooled support functions. The Council needs to review how it can undertake these functions more efficiently in partnership with schools to secure the best value for money.

## **6 Alternatives considered**

- 6.1 The proposals in this paper for a school improvement focused partnership (options one or two above) have the potential to support schools to remain within the local authority and prevent further academisation in line with the Mayor's election pledge. The alternative of continuing with the current arrangements (option three above) is likely to mean there is less effective support in place and lead to more schools choosing to convert to academy status over time.

## **7 Consultation**

**Name of Lead Member consulted:** Julianne Marriott

**Position:** Cabinet Member for Education

**Date:** 24 October 2018

## **8 Implications**

### **8.1 Financial Implications**

- 8.1.1 The paper provides three delivery options and four funding models for a school improvement focused partnership. Current illustrative costs from other boroughs vary significantly. These options will require costing and a detailed risk analysis to put them into the context for Newham. In addition scoping will be required for any one-off set-up costs. No

authorisation to spend is being sought in this paper, the potential financial implications should further work go ahead should be noted.

- 8.1.2 Utilising funding option 4 as a basis for calculation (seed funding from the Council and matched funding from schools); at £5 per pupil in maintained schools a £190k Council contribution would be made for a full year, based on current pupil numbers. Other options are shown in the first table below. These could form the base for calculation, whole seed or matched funding. A contribution of £2.50 per head would double the currently available budget (£70k). Additional funding would be generated from academies choosing to buy in.

**Possible funding increase based on per child**

Contribution per child (£)	Pupil Numbers	Total Funding (£)
0.5	38000	19000
1	38000	38000
2.5	38000	95000
3	38000	114000
5	38000	190000

- 8.1.3 The second table assumes a £5 contribution and per head either fixed on behalf of the council for the full student body or wholly matched funded. Uptake by schools is likely to affect the viability of impact.

**Level of school uptake**

	<b>50%</b>	<b>75%</b>	<b>100%</b>
<b>Match Funding</b>			
School	95,000	142,500	190,000
LA contribution	95,000	142,500	190,000
	<b>190,000</b>	<b>285,000</b>	<b>380,000</b>
<b>Seed Funding and match funding</b>			
School	95,000	142,500	190,000
LA contribution	190,000	190,000	190,000
	<b>285,000</b>	<b>332,500</b>	<b>380,000</b>

- 8.1.4 Given the pressures on General Fund, it is vital that any sustainable vehicle for school improvement be funded by schools as well as

General Fund.

## **8.2 Legal Implications**

- 8.2.1 The Authority has general duties to all pupils in the area, whether or not they go to a maintained school or Academy as set out in section 13A Education Act 1996 which states as follows:

*“13A Duty to promote high standards and fulfilment of potential*

*(1) A local authority in England must ensure that their relevant education functions and their relevant training functions are (so far as they are capable of being so exercised) exercised by the authority with a view to—*

*(a) promoting high standards,*  
*(b) ensuring fair access to opportunity for education and training, and*  
*(c) promoting the fulfilment of learning potential by every person to whom this subsection applies.*

*(2) Subsection (1) applies to the following—*

*(a) persons under the age of 20;*  
*(b) persons aged 20 or over and for whom an EHC plan is maintained”*

- 8.2.2 Any proposals will therefore have to consider how the Authority can maintain its general duties above to all pupils in the area. An Equality Impact Assessment will need to be developed in relation to the proposals set out in this Report in the normal way.

- 8.2.3 Also, as the principle within the Cabinet Report is to involve all education providers and stakeholders in decisions on the future of education then they should be involved in any decision to commit to a particular model of support.

## **8.3 Equalities Implications**

- 8.3.1 The Council has a public duty under the Equality Act 2010 to consider the impact of its decisions in terms of promoting and ensuring equality and cohesion across the different types of equality strands: age, sex, ethnicity/race, disability, sexual orientation, religion/belief, transgender and relating to pregnant and breastfeeding women.

- 8.3.2 The Council will carry out an Equality Impact Assessment on the final proposals before they are brought back to Cabinet.

## **8.4 Other Implications relevant to this report:**

- 8.4.1 No further implications identified.

## **9 Background Information used in the preparation of this report**



## Appendix 1 – Stakeholder engagement

1. Between July and November 2018, the Cabinet lead for Education and senior officers from the Council's education team held a series of discussions with education stakeholders across Newham. One important aim of the discussions was to ensure that the proposals in this paper were based on a good understanding of the priority issues for schools and for achieving continued educational excellence in Newham.

### Meetings with Governing Bodies of Maintained schools

2. Head teachers and Chairs of Governors of all maintained schools in Newham were contacted and the majority responded positively to our request to meet with the governing body. We would like to thank all those heads and governors who took the time to share their reflections and ideas with us.

3. As of November 21<sup>st</sup> 2018 the Cabinet lead for Education and officers had attended over 30 governing body meetings. In October, all Chairs of maintained school Governing Bodies were contacted by email to outline key themes from discussions so far, and to invite them to contribute further reflections and ideas.

4. The purpose of the meetings with Governing Bodies was threefold:
- to ensure that governors and heads were aware of the Council's commitment to supporting maintained schools
  - to learn more about the different ways that maintained schools are supporting pupils, the community and each other, and their perspectives on challenges and opportunities in schooling in Newham
  - to seek feedback on priorities for support for maintained schools

5. It is important to acknowledge the diversity of schools' perspectives and needs at the outset. Some maintained schools had made a firm decision not to academise, a few are actively considering becoming academies, and others had explored becoming academies but had discontinued the process for a variety of reasons. Not every maintained school would necessarily want to be part of a school improvement focused partnership, and schools will have diverse support needs and priorities. Some schools were positive in principle but questioned whether a partnership would be viable given the number of schools who had already academised. Nevertheless, there were considerable areas of consensus and these are summarised below.

6. Whilst the issue of funding and support for pupils with **Special Educational Needs and Disabilities (SEND)** is not specific to maintained schools, progress on this issue is a priority for schools and a key ingredient to building the trust needed for a sustainable partnership.

7. **School improvement support** was identified as a core element of any future support programme. Schools felt that there was a lack of clarity about the school improvement support on offer from teaching schools. Some questioned why certain MATs had been chosen to provide school improvement support. Others reported that the Council's approach to school improvement had been punitive (when schools



were in difficulties) and very limited (when schools were rated as 'good'). Some primary heads reported that they had been able to drive up their performance, but this had absorbed a huge amount of scarce resources. For the future:

- There was widespread agreement that school to school support is the best model, but that it has to be based on a **transparent and rigorous assessment of needs and who is best placed to fulfil these needs**.
- Some schools asked for school improvement to promote and celebrate a **wider curriculum**, suggesting that network meetings were reinstated. Others wanted the partnership to add value by supporting schools to work holistically with children: for example, by supporting year 6-7 transitions and the development of skills and pathways into work from an early age (e.g. through linking with local businesses to support skills development).
- Some schools hoped that **Continuing Professional Development** – including a leadership development programme - could be reinstated as part of the school improvement offer; although they recognised that the delegation of funds to schools and an approach based on school-to-school support could make this challenging.

8. Many schools wanted support which would help them **address financial pressures, and achieve efficiencies and economies of scale**. They would like:

- Support with commissioning and buying services, so that schools can achieve economies of scale: for example, in insurance, collective recruitment to save on agency fees, or the bulk delivery of books/artefacts to support curriculum and guided reading resources; better value and more timely repair works.
- Pooling of resources enabled through partnership-working and brokered by LBN: for example, shared specialist teachers.
- Support to enable schools to identify and bid for new funding streams.
- One school said they had received little support from OneSource to address their deficit position.

9. There was some discussion of **analysis, data and research**, with interest in the Council providing benchmarking information on attainment and attendance through a data dashboard, and in enhancing schools' access to cutting edge research, practice and speakers. Some schools voiced concern about the accuracy of Newham data, and about advice provided around GDPR.

10. Many of the discussions were about the **ways of working** that maintained schools would like to see in their relationship with the local authority and in any future partnership. They wanted to see:

- a clear vision which supports all schools, staff and children in Newham, underpinned by coherent, borough-wide statutory provision
- an approach to working with heads that builds an 'esprit de corps' and where the views of all heads are heard and taken into account
- a wider range and better quality of support
- an approach to partnership working that incorporated and built on the strengths of existing relationships – particularly the peer support arrangements

established through the Newham North Learning Partnership, the Manor Park Federation, and other – more informal – groupings

- clarity and accountability about what a new partnership arrangement can offer (and when) in return for a subscription
- engagement before decisions are made and an honest dialogue about what the Council really thinks about maintained schools in Newham, clarity about how schools can contribute to the partnership and about the basis on which some schools are identified to provide additional support

11. A wide range of specific issues were also raised in meetings. They included: building quality; early help; repairs; information about the early years pupil premium; admissions; food quality; picketing of schools; parking; pollution; parents access to benefits including disability living allowance; the future of the Every Child programme; policies on summer born children with SEND; the percentage of children attending two year-old health checks; and the removal of warning notices.

### **Wider stakeholder meetings**

12. Other discussions were held with representatives of the main teaching unions, Newham's National Leaders of Education in Newham and teaching schools, the Manor Park Schools Federation and Newham North Learning Partnership, the Board of Newham Partnership Working, heads of maintained nurseries, the 14-19 Education Leaders Forum, and the Governors Forum. At these meetings, emerging priorities were shared and discussed, and comments reflected in the development of proposals.

### **Parents and pupils**

13. Discussions were held with parents (one meeting of parent governors from maintained schools and academies and another meeting convened by parents) and pupils (school councils at St Bonaventure's, Grange and Essex schools): these focused more on experiences and aspirations for schools and education in Newham, rather than on the relationship between the local authority and schools or the content of a proposed school improvement offer.

14. Key points raised included:

- Both pupils and parents emphasised the importance of balancing the pursuit of strong academic results with a broad and balanced education which prepares children and young people for life and work.
- The need for employers to work with schools including meaningful work experience and careers guidance.
- Being 'prepared for tomorrow' i.e. children being ready for technological and social changes that are likely to affect their adult life.
- The importance of behaviour management to the effective running of schools.
- The need for a safe school environment.
- A desire to be happy and have a love for learning.

## **Appendix 2**

### **Summary of feedback from Partnership event for Newham maintained schools, 28 September**

#### Key themes from group feedback

##### **LA role:**

1. This should be a facilitating but not controlling one. The Council needs to be 'the glue' joining up systems and support that is already in place. It needs to create links between present school networks and local partnerships to make sure all schools have local support and can access the very successful practices already in place within local schools. The Council has a responsibility to promote the concept of the 'Newham family of schools' and a sense of collective responsibility between all local schools.

2. There is an understanding that local finances are under pressure and that there needs to be savings from local budgets. Are the present Council resources committed making enough impact on learning and pupil outcomes? Could better value be made from some of these resources?

##### **School priorities for change:**

##### ***School improvement***

3. Any additional or new offer should be support focused on school improvement. This needs to begin with improving the present in house school improvement offer. Schools welcome a challenge to their practice from experienced practitioners. There needs to be better quality assurance of services and more open and transparent procedures about who is selected to provide this type of support.

4. There is support for some form of subscription model that would build on the work of schools' present partnerships. All schools would need to commit and contribute for a period of time to test how this could work. Such a partnership system would ensure that there was management and leadership support between head teachers and others in senior leadership teams. New head teachers would be automatically supported with an induction programme.

5. There was an interest amongst schools for part of the offer to include a shared data pack which could be one of the ways of identifying successful practice. The network systems could create opportunities to share and develop teaching practices in priority areas identified by schools and from the local data. In the future this could move to local publication of successful strategies.

6. The present arrangements with the teaching schools needs to become more collaborative and less competitive between schools. The Council should play an enabling role to encourage teaching schools to work together so that there is a

system that is equitable and facilitates training across the borough responding to locally identified needs.

***Present core offer and services***

7. There is a genuine sense of impatience and frustration amongst schools. They want to see changes happen quickly. These include demonstrating consistency from services and a more effective quality assurance process. SEND and admissions were mentioned a number of times. Some comment that they have little confidence and that the existing offer isn't fit for purpose. Others have concerns about NPW's capacity to manage its present contracts.

8. Lack of trust has been mentioned many times. The council could begin to earn the trust of more schools again by;

- demonstrating better communication between its services so that there is improved signposting to the most relevant support
- publishing expectations of its present services
- provide data about services and local needs such as SEND

## **Appendix 3**

### **Newham Education Partnership Board - Terms of Reference**

*Agreed at working group meeting on 19 October 2018*

#### **Introduction**

1. The vision of a Newham Education Partnership is to improve the existing collaborative working between the community of Newham schools, the Council and other key stakeholders so that all the borough's children and young people have the best possible educational opportunities, outcomes and life chances. We want to remove and reduce barriers to successful learning and independence for our young people. Our vision is underpinned by our values of aspiration, trust and support, equality, transparency and accountability.
2. The aim of our vision is to deliver better outcomes each year for all the children and young people in our community. These outcomes include our children and young people; being and feeling safe, being healthy, playing an active part in their local community, becoming more independent and achieving academic success.
3. Our vision recognises the many good practices in place in schools but also acknowledges there are some who are not achieving as they should. We believe that improvement in the future needs to continue to be school-led and we promote this, as demonstrated by:
  - Schools being in control and responsible
  - Learning from each other to spread effective practice
  - Groups of schools facilitating, commissioning and brokering support and challenge
  - Schools collaborating to access the support they need
4. At the same time, we understand that schools are part of a wider community and have responsibilities towards all children and young people in Newham. Effective school improvement in its broadest sense needs the participation of a diverse group of stakeholders able to advise and support education professionals.

#### **Purpose**

5. The main purpose of the Newham Education Partnership board is to support the vision and the values agreed by all partners and model these in its own practice. Reflecting the diversity of schools and their stakeholders it will advise and consult with key partners on the strategic direction and performance. The board will use its knowledge and expertise to interrogate data, challenge present performance, propose key priorities and suggest ways for sharing effective practice and achieving improvements.
6. The Council will support Newham Education Partnership to ensure effective school improvement is embedded in a wider understanding of the local community and its needs as well as recognising emerging changes in its hopes and aspirations. The Partnership board has the following key functions:

- Use data to inform key strategic decisions including the commissioning of work to address priorities
- Advise on the direction delivery and monitoring of strategic priorities
- Provide a consultative arena for new ideas and developments
- Draw on the diversity of its membership to problem-solve and celebrate educational achievement for all

7. By doing so it will help to build support, community credibility and wider recognition of the Education Partnership ensuring a combined greater confidence about how best to make a positive difference for young people in the borough.

## **Membership**

8. The membership of the Newham Education Partnership comprises representatives of headteachers or principals from all types of schools, colleges and sectors of education as well as the local authority. Head teachers are nominated by their local groups NAPH and NASH with at least two secondary heads and two primary heads and the Newham Director of Education or their representative needed to make any meeting quorate. NAPH and NASH will ensure that each year the membership of the partnership board has representation from:

- maintained schools
- Free schools and Academy Trust schools
- primary schools
- secondary schools
- special schools and PRU or alternative provisions

9. In addition the Council will ensure that there is at least one member representing the early years sector and another member representing post 16 providers. From time to time it may also be appropriate to co-opt members if additional skills or expertise are required other than those listed above.

## **Roles and responsibilities**

10. The members will be expected to be active participants in the Newham Education Partnership and its business. This will primarily be demonstrated by providing a representative voice from their particular constituency and thereby ensuring a two-way communication.

11. The board will seek views and engage other stakeholder groups to ensure that all parts of the local community have a voice in shaping developments and strategy. These groups will include; school governors, faith organisations, trade unions, carers and parents, children and young people, health and social care services.

12. The board will ensure that it works in partnership with other stakeholder groups by;

- seeking views from other stakeholder groups and their forums relating to each topic under discussion,
- inviting representatives to the board from the aforementioned groups for specific items under discussion and

- sharing its agendas with other groups in advance of its meetings and minutes of its meeting when they are agreed.

13. The chair will be elected by the board and will serve as chair for at least one year. A deputy chair will be agreed at the same time.

### **Meeting frequency and business**

14. The Newham Education Partnership Board will meet twice each term though additional meetings may be agreed by the board if business requires additional time. It may also seek views and consult with members between meetings.

The main items of business would be;

- school performance data and how best and effective practice can be shared across schools,
- commissioning of innovative practice to support further school improvement
- Local Authority strategic educational plans that require school support and involvement to be effective
- Local Authority strategic non educational plans that require school support and involvement to be effective e.g. youth safety

### **Stakeholder groups and forums that will contribute to the Newham Education Partnership board**

CYP strategic trade unions termly meetings  
 Governors' forum termly meetings  
 NAPH/NASH monthly meetings  
 NPW board meetings  
 Newham 14-19 Education Partnership  
 Youth Assemblies  
 Central Services Operating Group (CSOG)



## **Appendix 4**

### **Potential content of a school improvement focused support offer**

#### **1. Challenge and support**

Challenge and support to all schools, regardless how successful they are and what are their present priorities for improvement.

- Desktop analysis and review of data and risk assessment
- Leadership Consultancy for all schools

#### **2. Data analysis**

It is important that this is robust and built on accurate data analysis to support schools in identifying school improvement priorities for the coming year.

- All schools will receive a data analysis pack
- Data headlines will be provided towards the end of the Summer Term for primary and by the end of August for secondary.
- Full and comprehensive analysis (including student level analysis) will be provided in the autumn term
- The full analysis pack will provide a narrative, data highlights and an executive summary alongside extensive data analysis
- Comparative data across all schools in Newham, within London and Nationally
- Interactive data packs to support collaboration and school improvement

#### **3. Peer review and development**

Schools learn best from each other in a spirit of trust and collaboration. Peer review is the cornerstone of effective collaboration and is complementary to other components of the membership offer.

- All member schools are should play an active role in a Peer Review process.
- Brokerage to support the implementation of Peer Reviews by supporting individual schools to find groups of schools to join and support them in identifying the Peer Review model that best suits their needs

#### **4. Network meetings**

Organising network meetings to share good practice, build expertise and keep up to date with the latest developments in curriculum areas. Leadership networks to provide the space for colleagues to challenge and support each other. All network meetings will provide excellent CPD and information sharing opportunities.

- Access to primary and secondary phase subject network meetings
- Primary networks: such as EAL, English, Maths, MFL, RE Science
- Secondary networks: such as English, Geography, History, Maths, Media Studies, MFL, PE
- Leadership Networks: such as Post-16 Forum, Deputy Headteachers & Assistant Headteachers

#### **5. Professional learning**

Professional learning opportunities for teachers and leaders in member schools to support and challenge at all stages of a teacher's development.

- New Headteacher induction programme
- Leadership Forum

- Updates in the form of newsletters and an annual Learning and Teaching journal
- Signposting professional learning and other opportunities within the borough
- National and international education links

## **6. Participation in research and projects**

Promoting evidenced based school improvement strategies. Everything works somewhere but what works best in a particular school's context and with their staff and students?

## **7. Support during an Ofsted inspection**

When the Ofsted call comes and sharing knowledge of each school with the Lead Inspector.

- Initial telephone support when a school gets the call
- Meeting with the Lead Inspector
- Attendance at the feedback meeting

## **8. Brokering school to school support**

A school led system is the best way to improve outcomes for all young people. If the need arises, brokering school to school support, finding the best partnership for each school or setting.

## **9. Telephone support, advice and guidance**

It is important to be able to pick up the phone and seek advice on a range of issues.

- Signposting to the right agencies or people to help support and guidance

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## LONDON BOROUGH OF NEWHAM

### Cabinet

<b>Report title</b>	<b>Developing a Children and Young People's Participation and Engagement Strategy</b>	
<b>Date of Meeting</b>	<b>4<sup>th</sup> December 2018</b>	
<b>Lead Officer and contact details</b>	<b>Elaine Redding – Director of Service Improvement</b> <a href="mailto:elaine.redding@newham.gov.uk">elaine.redding@newham.gov.uk</a> <b>Nasima Patel – Strategic Lead for Early Help</b> <a href="mailto:nasima.patel@newham.gov.uk">nasima.patel@newham.gov.uk</a>	
<b>Director, Job title</b>	<b>Grainne Siggins: Executive Director – Strategic Commissioning</b>	
<b>Key Decision?</b>	Yes	Reasons: All Wards affected
<b>Wards Affected</b>	All	
<b>Appendices (if any)</b>		

### 1 Executive Summary

- 1.1 The council is committed to ensuring that children and young people's voices are heard, listened to and responded to, both in operational delivery and as part of local strategic ambitions. In order to progress this, the report outlines an approach to developing a children and young people's participation and engagement strategy.

### 2 Recommendations

- 2.1 Cabinet is recommended to agree:
- 2.1.1 The development of a Newham Children and Young People's Participation and Engagement Strategy building on the work of Children's Services, Communities and Neighbourhoods and the Young Mayor;
  - 2.1.2 A commitment from council officers and elected members to support the development of a strong participation culture within the London Borough of Newham.

### 3 Background

- 3.1 Participation is a fundamental right for children, young people and their families when receiving services from the Council. Article 12 of the United Nations

Convention on the Rights of the Child states that children and young people have a basic right to have a say and be taken seriously in all matters which affect them and requires government organisations to actively engage them in decision making. This right is codified in the Children Act 1989 and reinforced in the Children Act 2004; it is also explicitly considered in the current Ofsted framework for the Inspection of Local Authority Children's Services and is considered as a key component by the sector of what constitutes good practice.

- 3.2 Participation can be categorised into two major types: work with individuals (normally those in receipt of a service) and work with groups as set out in the table below. In this context it applies to all children and young people aged under 18 and in some circumstances under 25 (e.g. care leavers and young people with particular education or health needs).

Individual Participation	Collective Participation
<ul style="list-style-type: none"> <li>• One-to-one consultation with social workers, managers and others.</li> <li>• Submission of views to assessment, planning and review meetings.</li> <li>• Attendance and being actively involved in meetings.</li> <li>• Use of advocates to bring views to the attention of the decision-makers.</li> <li>• Engaging in a process of family-led decision-making (e.g. family group conferences).</li> <li>• Using the complaints procedure.</li> </ul>	<ul style="list-style-type: none"> <li>• Involving children and young people in the planning and design of services.</li> <li>• Forums convened by the service.</li> <li>• Involving a panel of children in the recruitment of personnel.</li> <li>• Involving children in the development and delivery of training.</li> <li>• Including children's views in audit inspection reports.</li> <li>• Consultations or research conducted with children in receipt of services.</li> <li>• Child- or youth-led action research.</li> </ul>

- 3.3 Following the Ofsted Single Inspection of Local Authority Children's Services in June 2014, there was commentary on the quality of work in this key area. Ofsted returned to this theme in the Focused Visit in February 2018, verbally advising progress since their last inspection. It should also be noted that an analysis of recent reports for authorities identified by Ofsted as good or outstanding, effective participation was a key criteria in their judgement.

- 3.4 In addition to the need to evidence progress in this important area for Ofsted and to deliver to wider council priorities, effective participation has multiple benefits, these include:

- A higher level of engagement with the service means better outcomes and experience for the young person who is engaged and others;
- Services can be more effective, better targeted and received. Potentially delivering better value in line with the Councils' vision and values;
- Children and young people often bring new thinking which can generate new solutions to long standing service delivery challenges and improve outcomes;

- Children and young people's active participation can encourage other children and young people to become involved, widening reach and messaging;
- Children and young people can develop skills that will be useful for life and work;
- It is imperative given the concerns about youth safety that the Council enable children and young people to have a mechanism to talk about services and solutions that enhance their safety and well-being;
- Children and young people can increase their confidence and self esteem;
- Children and young people can influence and change the services they receive and therefore receive the services they want and need;
- Children and young people feel more ownership of services, communities and groups and are more likely to commit to being involved;
- Fostering a greater understanding of the adult world / council and their interaction with it;
- Fun, enjoyment, developing personal friendships as well as personal growth and improved resilience;
- Supports a feedback and learning culture in services and cross the Council;
- A 'we listen and we deliver' principle is a hallmark of all successful high performing organisations.

## 4 Considerations & Proposals

### 4.1 Participation Self-Assessment

In August 2018, Children's Social Care started a piece of work to measure and evaluate the quality of participation with children and young people in Newham using the "Hear by Right" framework developed by the National Youth Agency. The framework provides a useful benchmark of the quality of participation taking place.

- 4.2 The assessment was completed through a series of interviews with key staff and stakeholders in Newham and a workshop. The framework considers six aspects of participation practice (values, strategies, structures, staff, skills and knowledge and leadership).
- 4.3 **Shared Values:** Staff noted that participation is valued in the borough, but not systematically. They were unable to describe the organisational values and commitment to involve children and young people in their own plans or the development of services.
- 4.4 **Strategies:** The strategies in place are not widely known about and need to be refreshed in line with the new administrations political intentions.

- 4.5 **Structures:** The stakeholders spoken to were positive about the range of structures available to support participation. They referenced the Children in Care Council, Care Leavers Forum, Youth Action Zones and Youth Assemblies, VOCAL (Voice of Challenged Adolescent Learners) and others.
- 4.6 **Staff Recruitment:** Those spoken to identified this as an area for development. Children and young people have not routinely been involved in the recruitment of staff sufficiently and participation values are not routinely built into job descriptions or considered in performance reviews/appraisals.
- 4.7 **Skills and Knowledge:** The findings were variable. There are some staff with excellent skills and knowledge in this area, whilst others have limited knowledge. Without exception everyone spoken to agree there was insufficient capacity within the Council to service this critical area.
- 4.8 **Leadership:** Staff thought there was insufficient evidence of Senior Leaders championing the participation agenda, but were very positive about the commitment and enthusiasm of the new Mayor to prioritise this key issue.
- 4.9 The Hear by Right self-assessment identifies a mixed picture. It describes a fragmented approach with elements of good practice limited by insufficient co-ordination, capacity and a need for greater commitment from leaders in the Council to support Participation.
- 4.10 The self-assessment also recognises key strengths, these include:
- Youth Movements: These are representative groups that have been developed around Newham's Youth Zones;
  - Annual Youth Zone Surveys: Each of the 5 Youth Zones have completed an annual survey, which generates useful information about young people views on living in the borough;
  - Youth Assemblies: The first was held on the 13th July 2018 and attended by Rokhsana Fiaz OBE on her first day of office as the Mayor of Newham. A list of priorities for further discussion and action have been collated from the contributions voiced by young people on the day. These assemblies represent a coming together of the youth movements from across Newham and are planned to take place twice each year;
  - Addressing Safety through Active Participation: Held on 27th January 2018 – this event that was well attended by young people with a multi-agency panel of senior leaders from the Council, Police, Health and others which addressed issues of concern to local young panel (e.g. gangs and knife crime);
  - Voice of Challenged Adolescent Learners (VOCAL): This group was set up to engage young people with special educational needs in the participation agenda;
  - Bright Spots Survey February and March 2017: This was a survey of young people in care to Newham completed by 119 Looked After Children (LAC) and young people from the borough;



- Children in Care Council: There are two different age groups that meet on a regular basis:
- Care Leaver Forum: This group have a work plan to review LAC Packs, Care Leavers Offer and make a short film with Care Leavers giving advice and tips with how to achieve goals as a Care Leaver in Newham;.
- Purchase of 'Mind of My Own'<sup>1</sup>: - This is a phone app that helps young people express their views and enables workers to evidence them. Newham has purchased the app and is in the process of rolling it out to young people in care and will be later extended to those who are subject to child protection plans.

#### **4.11 Future Priorities and Areas for Development**

The work conducted to date highlights 3 priorities for the future of Participation in Newham. These are: developing a Participation Strategy, building capacity and developing a strong commitment from leaders in the Council to ensure active participation of children and young people in decisions that affect them.

#### **4.12 Developing a Participation & Engagement Strategy**

The new strategy needs to be developed and co-produced with children and young people. It needs to provide a clear and coherent framework for delivering effective engagement and participation.

Clarity between advocacy for vulnerable children (including Looked After Children) which is part of our statutory responsibility and wider advocacy is required and in need of strengthened co-ordination.

A key element of the work must be to identify clear mechanisms whereby children and young people can see that their views have been heard and acted upon, or where this is not possible / appropriate the reasons are clearly explained.

Work has already started in this area with a workshop held on the 26<sup>th</sup> September 2018 that identified opportunities to consult and engage young Newham residents in the design and co-production of the strategy.

It is proposed that the strategy is a corporate strategy outlining the ambition of the council to engage children and young people. This is to build on and include all participation activity with children and young people undertaken by Children's Services, Community and Neighbourhoods and the work of the Young Mayor

#### **4.13 Building Capacity**

Staff consulted to date has identified a lack of capacity to support participation. Newham is a borough with population of 347,996 people at the time of this report, of whom approximately 85,775 are aged under 18. The higher than average youth population is a particular characteristic of Newham's

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<sup>1</sup> <http://mindofmyown.org.uk>

demography and needs to be taken into account when planning services.

#### **4.14 Leadership and Participation**

Effective participation strategies require strong engagement and commitment from Service Leaders and Elected Members. The development of the new Newham Children and Young People's Participation & Engagement strategy will require senior representatives of the Council (officers and members) to engage with children and young people to hear their views. There will need to be a commitment to new processes and mechanisms that will provide children and young people the opportunity to influence decisions about their own lives and the design of services provided by the Council.

### **5 Policy Implications**

If the recommendations of the report are accepted a single overarching strategy will be developed for all participation and engagement with children and young people in Newham will be developed. This will be embraced by all directorates and departments setting out clear expectation of how children and young people should be involved in decisions and developments that affect them.

### **6 Alternatives considered**

The status quo could be maintained, but this would contribute to the continuing delivery of an approach which does not fully embrace the political ambition for children and young people in the borough.

### **7 Consultation**

The development of a participation and engagement strategy was discussed with Councillor Charlene McClean at the beginning of September 2018.

#### **7.1 Legal Implications**

Effective engagement and participation is a right enshrined in article 12 of the United Nations Rights of the Child Convention and built into a range of UK legislation (Children Act 1989 & 2004).

#### **7.2 Equalities Implications**

Effective participation is important to promoting and supporting inclusion of all groups with protected characteristics. When the Participation Strategy has been drafted it will be subject to an equality impact assessment.

#### **7.3 Other Implications relevant to this report:**

None

### **8 10. Background Information used in the preparation of this report**

UN Convention on the Rights of The Child

[https://downloads.unicef.org.uk/wp-content/uploads/2010/05/UNCRC\\_united\\_nations\\_convention\\_on\\_the\\_rights\\_of\\_the\\_child.pdf?\\_ga=2.264405647.1885680737.1538835762-](https://downloads.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf?_ga=2.264405647.1885680737.1538835762-)

[28779367.1538835762](https://www.legislation.gov.uk/ukpga/1989/41/contents)

Children Act 1989

<https://www.legislation.gov.uk/ukpga/1989/41/contents>

Children Act 2004

<https://www.legislation.gov.uk/ukpga/2004/31/contents>

Newham Ofsted Inspection June 2014

<https://files.api.beta.ofsted.gov.uk/v1/file/50004279>

Newham Ofsted Focused Visit February 2018

<https://files.api.beta.ofsted.gov.uk/v1/file/50000280>

Hear by Right – NYA - Developing Best Practice in Young People's Participation

<https://nya.org.uk/wp-content/uploads/2018/06/Hear-by-Right-.pdf>

## **Reason for Urgency**

Development of the Children and Young People's Participation and Engagement Strategy following the return of the key theme in the focus visit by Ofsted as noted in the report

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## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	<b>Council's response to Brexit</b>	
<b>Date of Meeting</b>	<b>4<sup>th</sup> December 2018</b>	
<b>Lead Officer and contact details</b>	<b>Janaki Mahadevan 02033733249</b> <a href="mailto:janaki.mahadevan@newham.gov.uk">janaki.mahadevan@newham.gov.uk</a>	
<b>Director, Job title</b>	<b>Paul Pugh, Interim Assistant Chief Executive</b>	
<b>Lead Member</b>	<b>Rokhsana Fiaz</b>	
<b>Key Decision?</b>	No	Reasons:
<b>Exempt information &amp; Grounds</b>	No	Grounds:
<b>Wards Affected</b>		
<b>Appendices (if any)</b>		

#### 1 Executive Summary

- 1.1 This report is being presented to Cabinet to set out the actions the Council has taken to date to prepare for the impact of Britain's exit from the EU.
- 1.2 The London Borough of Newham's resilience team have been preparing for the impact of Brexit, including looking at the potential immediate impact on the council of a 'no deal' scenario as part of the council's risk management processes and business continuity planning. Newham is also engaging in London-wide planning through the London Resilience Partnership. Work is also under way through the Royal Docks Enterprise Zone board to consider the potential impact on London's only Enterprise Zone, which is located in Newham.
- 1.3 More widely, the Council is committed to increasing benefits to the local community from investment in the borough including skills and employment opportunities, as well as developing a local social integration strategy.
- 1.4 Building on this work, the Mayor of Newham has committed to establish a Newham and Brexit Board to make further progress with Newham Council's preparedness and contingency planning.

#### 2 Recommendations

- 2.1 For the reasons set out in the report, Cabinet is recommended to:
  - i. Note the report and the planned establishment of the Newham and Brexit Board.
  - ii. Note that the Mayor and Cabinet will receive regular updates on this work stream

### **3 Background**

- 3.1 On 23 June 2016 Britain voted to leave the European Union. London was the only region within England to vote with a majority to remain in the EU, with 59.9 per cent of the vote (2.26 million votes). In Newham 52.84 per cent voted to remain in the EU (55,328 votes) with a voter turnout of 59.25%.
- 3.2 Estimates based on the Electoral Register and National Insurance Number registrations suggest the number of EU nationals living in Newham could be upwards of 40,000.
- 3.3 Following the triggering of Article 50 in March 2017, which is the means through which Government formally triggers the withdrawal process, the Government has engaged in work to reach a deal with the EU on the terms of Britain's exit from the EU. This two year process will come to a close in March 2019 after which the outcomes of the negotiations will come into force.
- 3.4 There is continued uncertainty regarding the agreement the Government will reach with the EU and without knowing the exact details of a deal or indeed a "no deal" scenario, it is hard to determine with any accuracy the likely impact.
- 3.5 However, the Council is preparing for a range of outcomes and engaging with a range of bodies at both a regional and national level to keep up-to-date with developments and therefore ensure its planning is regularly reviewed.

### **4 Key Considerations & Proposals**

- 4.1 Council officers are continuing to assess the impact of potential outcomes of government negotiations on Britain's exit from the EU. Information that has been collated within the Council to date on potential "no deal" scenarios has been communicated to the London Resilience Partnership, which is leading on this work from a pan-London perspective. Newham continues to engage with the Greater London Authority (GLA), London Councils and the Local Government Association (LGA) to ensure that any detail on potential challenges or opportunities for local authorities are known and fully appraised.
- 4.2 The London Resilience Partnership is expected to develop a risk assessment related to Britain's exit from the EU, which will evolve during the period to March 2019 as further clarity emerges. In conjunction with the issues raised by Council officers, this will inform local planning requirements. Where the Council's ongoing assessment has raised concerns about potential impact on activity, work is already underway to mitigate any risk, including engagement with external suppliers of Council supplies and services and potential HR issues resulting in a "no deal" situation.
- 4.3 Assessment work is continuing and will inform an action plan for the Council and accompanying contingency arrangements to ensure the Council is prepared for the immediate period following March 2019 and beyond. This work stream is being co-ordinated by the Strategic Enforcement Manager (Operational Support).

- 4.4 As well as preparing for potential impact on day to day operations, the Council is developing and accelerating activity intended to support good growth in the borough, which in turn will aim to minimise any negative impact of Brexit. The Council will also look at potential social implications of any Brexit arrangement related to community tensions and equalities.
- 4.5 Newham is developing a Community Wealth Building strategy to ensure economic growth in the borough is shared locally and held democratically. This new approach means the Council is not just looking outwards, at attracting investment. It will also focus inwards, at realising the potential of the community, residents, businesses and voluntary sector. This includes reviewing and strengthening employment and skills opportunities, reviewing procurement activity and support for Newham businesses.
- 4.6 Newham is home to some of the largest development schemes in London and is home to London's only Enterprise Zone in the Royal Docks. The Council is currently ensuring that the value these developments bring benefits our local community. This includes ensuring sufficient high quality opportunities for Newham residents, particularly young people and traditionally underrepresented groups. Newham is working closely with the GLA to prepare for any impact on the Enterprise Zone and bolster inward investment to the area.
- 4.7 The Council is also developing a local social integration strategy that reflects *All of Us*, The Mayor of London's strategy for Social Integration. This will aim to strengthen cohesion and community bonds, increase civic engagement and address wider inequalities.
- 4.8 It is important to note that although the Council is continuing to plan for all possible eventualities related to Britain's exit from the EU, much of the impact on the borough, both short-term and long-term, is unknown, and is likely to remain so until the final arrangements of leaving the EU have been agreed. In the meantime, the Mayor of Newham has committed to convene a Newham and Brexit Board to progress with Newham Council's preparedness and contingency planning. The Board will be chaired by the Mayor and the Cabinet Lead Member for Finance, with other members from key partner organisations. It will be supported by expert advisers and an officer working group. It will consider the social and economic implications of any Brexit arrangement which is determined nationally; and implement appropriate assurance measures.

## **5 Policy Implications & Corporate Priorities**

- 5.1 Britain's exit from the EU is likely to have a number of implications on Council operations and Newham's community. These will range from impact on services as a result of changes to workforce, Council processes, funding streams and fluctuations in the financial market. It is also likely to impact upon residents and the local economy.
- 5.2 With this in mind, further comprehensive contingency planning will be required to minimise any negative impact and ensure that the Council is proactive in seeking and implementing alternative and emergency arrangements as



required.

## **6 Alternatives considered**

6.1 N/A

## **7 Consultation**

7.1 **Name of Lead Member consulted:** Rokhsana Fiaz **Position:** Mayor of Newham **Date:** November 2018

## **8 Implications**

### **8.1 Financial Implications**

8.1.1 This report is for noting and there are no direct financial implications at this stage. As further details emerge of the deal under which Britain will exit the EU, or if there will be no agreed deal, further work will be required to assess the financial implications for the borough. Newham is currently engaged in *Unlocking London's Opportunities*, an employment and skills programme operating across East London's Growth Boroughs which aims to support 10,000 unemployed residents into work. The programme is funded by the European Social Fund from 2014 to 2020. The government has agreed that the UK will continue to take part in all EU programmes post 29 March 2019 for the rest of the 2014-2020 Multiannual Financial Framework.

### **8.2 Legal Implications**

8.2.1 This report is for noting and there are no direct legal implications. Until the detail of the agreement is known (including if there is a "no deal" situation), it is not possible to identify the legal implications of Brexit for the borough. Likely future areas of legal impact will include particularly procurement of goods, services and works and state aid (The current indication is that existing rules will continue and the Competition and Markets Authority will regulate state aid with similar rules). Existing contracts will not be affected; employment and engagement of EU nationals especially if there is a "no deal situation"; regulatory regimes based on EU provisions or cooperation (in most cases it is anticipated that equivalent domestic regulations will be introduced); programmes reliant on EU funding will be affected when this expires.

### **8.3 Equalities Implications**

8.3.1 This report is for noting. Any work on this agenda going forward will consider equalities implications as details emerge.

### **8.4 Other Implications relevant to this report:**

8.4.1 N/A

## **9 Background Information used in the preparation of this report**

9.1 N/A



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## LONDON BOROUGH OF NEWHAM

### Cabinet

<b>Report title</b>	<b>Council Performance</b>	
<b>Date of Meeting</b>	<b>4<sup>th</sup> December 2018</b>	
<b>Lead Officer and contact details</b>	<b>Jonathan Awoo-Adongo, Performance Manager Zoë Qureshi, Principal Performance Officer ext. 31138</b>	
<b>Director, Job title</b>	<b>Paul Pugh, Interim Assistant Chief Executive</b>	
<b>Key Decision?</b>	No	Reasons: N/A
<b>Wards Affected</b>	All	
<b>Appendices (if any)</b>	1. Summary of key performance issues 2. Full Mid-Year 2018-19 Performance Report	

#### 1. Executive Summary

1.1 This report publishes for the first time ever the full suite of current corporate performance indicators, using mid-year performance data (April to Sept 2018) and sets out how the council's performance management framework will change to ensure that:

- our performance measures fully reflect the priorities of the council;
- performance data are published regularly, and accessible so residents can see how the council is performing;
- services are accountable for delivery and for driving improvement.

#### 2. Recommendations

2.1 Cabinet is asked to:

- Note and comment on the mid-year performance data report and summary (April to Sept 2018).
- Endorse the work in progress to establish a more effective performance management framework.

#### 3. Background

3.1 The Council's existing performance management framework falls well short of best practice in local government and elsewhere in the public sector. Current performance data derive from a framework established over 10 years ago by a previous administration. That framework uses over 270 performance indicators. The full suite of indicators has never been published as a Cabinet report before.

## **4. Key Considerations & Proposals**

4.1 Well-managed organisations require a performance and planning framework which sets out clearly the corporate priorities, with key deliverables and performance indicators which capture how, and how effectively, those priorities are delivered. That provides a clear context for the business plans of each service area, and can be cascaded into the objectives and performance measures for all members of staff. It is also part of ensuring effective internal control. Open publication of performance data enables residents, customers and others to judge how effectively the organisation is performing.

4.2 None of those key elements exists in Newham at present. As part of the Mayor's commitments to resetting the way the Council operates, and to achieving greater transparency, efficiency and good governance, we will be putting in place for 2019/20 onwards a new performance and planning framework which reflects best practice. That will include:

- Overview and Scrutiny Committee will have access to examine the Council's performance on a quarterly basis.
- Quarterly Cabinet Reports that will publish the performance data and pick up performance issues for the council as a whole. That will highlight both problems and good performance.
- Timely performance information will be openly available to residents.
- Members of staff will be able to understand how their work contributes to the overall priorities and performance of the Council.

4.3 Cabinet members will be fully involved in that work. We expect to present a proposed new set of measures and targets to Cabinet before the start of the next financial year.

4.4 In the meantime, as a step towards greater transparency, this report sets out the details of the current performance indicators and their trajectory, showing whether service delivery is improving or getting worse. Appendix 1 summarises briefly the key issues in each service area. Appendix 2 contains the detailed information for each current indicator, with relevant recent historical data, and a brief commentary on current performance.

## **5. Policy Implications**

5.1 The performance management framework will link directly to the corporate plan which will incorporate Mayoral priorities and support monitoring of the council's delivery against these priorities. It will also be aligned with the Medium Term Financial Strategy. The new arrangements will require major changes to the culture and ways of working within the organisation.

## **6. Alternatives considered**

6.1 The alternative to not publishing current data would be a continuing lack of transparency about the Council's performance. That would undermine the ability of members and residents to understand how well the organisation is performing, and whether resources are

being used effectively.

## **7. Consultation**

**7.1 Name of Lead Member consulted:** Rokhsana Fiaz, Mayor **Date:** November 2018

## **8. Implications**

### **Financial Implications**

8.1 There are no direct financial implications from the report. In future, however, the new performance framework, and improved scrutiny of how the council is performing should improve value for money. Links between performance information and expenditure will be strengthened and will support monitoring of the MTFS.

## **9. Legal Implications**

9.1 None at this stage.

## **10. Equalities Implications**

10.1 All sections of the community are affected by the Council's performance; and in developing a new suite of indicators, we will consider how effectively they assess the impact of Council services in tackling inequalities.

**Other Implications relevant to this report:**

NA

**Background Information used in the preparation of this report**

## **APPENDIX 1**

### **Environment**

#### **What's performing well**

- By deploying resources to areas most affected by litter, Local Environmental Quality Index (LEQs) scores for the presence of litter on Newham's high streets and residential streets have exceeded target this year with an average score of 4.7% since April 2018 compared to a target of 6% (with a lower figure rating better performance).
- The service continues to focus on the removal of litter which resident surveys tell us has a negative visual impact on the environment.

#### **What do we need to improve?**

- The year to date Local Environmental Quality Index (LEQs) score for presence of detritus (finely broken up material such as rotten leaves) on Newham's high streets and residential streets at 9.2% is below the 6% target (with a lower figure rating better performance). The service has generally focused on the removal of litter ahead of detritus as this has a bigger impact on residents' perception of cleanliness.

### **Regeneration**

#### **What's performing well**

- Excellent performance has been maintained for the timeliness of deciding major and non-major planning applications with 100% of applications decided on time in the 6 months to September 2018. Latest benchmarking data demonstrates that Newham's performance is above the London average of 88% for major planning applications.

#### **What do we need to improve?**

- Work is required to develop new regeneration performance measures aligned to the Housing Delivery agenda and which demonstrate the council's commitment to greater community engagement in the regeneration of the borough.

### **Housing**

#### **What's performing well**

- Performance on private sector rented property licensing and enforcement activity has been consistently good, contributing to raising rented sector standards and identifying over £5m in additional council tax. The 29,644 private sector rented properties licenced are estimated to cover 77% of the licensable population.



## What do we need to improve?

- The average number of weeks that tenants are in rent arrears for both LBN managed properties and temporary accommodation is increasing. Rent collection in 2018-19 has been adversely impacted by the rollout of full-service Universal Credit for secure accommodation.
- From October 2018 staffing resources have been reorganised, splitting the management of debt recovery from income collection. This specialisation is intended to improve the efficiency of arrears management activities and includes additional staff time being directed to evening contact with residents.

## Adult Social Care

### What's performing well

#### **Delayed Transfers of Care from Hospital**

- Newham continues to perform well in ensuring that people discharged from hospital are discharged with minimal delays, achieving a delayed transfers of care rate of 1.4 against the London average of 2.1 and a national average of 3.2 (a lower rate means fewer delays). In 2017/18, Newham was the best performing borough in London and 6<sup>th</sup> best nationally. This is a good indicator of positive joint working across health and council services in Newham.

## What do we need to improve?

#### **Assessments and Reviews of the Carers of Adult Social Care Customers**

- 23% of carers have been assessed or reviewed this year to date, a reduction on 41% achieved at the same point last year. This is in part due to a number of carers who have been offered a review but have declined. There is a targeted piece of work led by the Principal Social Workers to analyse current activity and to make improvements. The service has a target to assess or review 60% of carers by the end of the year.

## Children and Young People

### What's performing well

- There has been a significant increase in the number of children adopted compared with the same period in the previous year. Where children remain looked after, placement stability has improved in 2018 compared to 2017, with a 7% point improvement at the end of Q2 in those subject to 3+ placement moves. 100% of looked after child reviews held in September 2018 included the participation of the child or young person.
- Attainment at all ages between EYFS and GCSE, has improved in 2018. Just over 8 in every 10 pupils (81%) achieved the expected standard in reading at Key Stage 2, which

was around 6 % points ahead of the national average of 75%. Newham saw an equivalent improvement in the combined score for reading, writing and maths at Key Stage 2, ranking 7th nationally.

#### What do we need to improve?

- The timeliness of Single Assessments has decreased from 71.3% in August 2018 to 63.1% in September 2018 as all assessment teams worked to complete assessments before the launch of the integrated service on 3rd September. There is a small decline in the number of looked after children cases which were reviewed within the required timescales, moving from 97.6% in August down to 93.3% in September.
- Whilst participation is excellent, there is a small decline in the number of looked after children cases who were reviewed within the required timescales, moving from 97.6% in August down to 93.3% in September, and child protection cases reviewed within timescale sit at a similar level of 93.8%.

### Local Economy

#### What's performing well

- The gap between Newham's current employment rate of 70% and the London average of 74% has significantly reduced from the 15 percentage point gap being reported twelve years ago.

#### What do we need to improve?

- Historically, by making significant investment in Newham's job brokerage service – Workplace – the council has supported increased levels of employment in the borough. However employment levels of different groups of residents have not all risen at the same rate. Furthermore, rises in employment rate have not been reflected by a comparable rise in levels of income in the borough.
- There is an opportunity for more targeted work to take place to ensure that rises in employment rate are more evenly spread throughout all of our communities and that our residents are best placed to compete for the range of new and more highly skilled jobs due to be created in the borough over the next decade.

### Community

#### What's performing well

- There has been a significant increase in the number of attendances at our libraries with 859,817 visits so far this financial year, in part a result of the success of the Summer Reading Challenge with classes visiting libraries and many new young people obtaining a library card.

## What do we need to improve?

- Performance on call answering by the Contact Centre has fallen when compared to last year (85% of calls were answered in September compared to 93% in September last year). This has been caused by recruitment delays which have now been resolved. As newly recruited members of staff are trained we can expect to see performance return to the consistently high levels seen in 2017/18.
- The Customer Services Team continues to identify digital opportunities for residents to access the information they need more rapidly online.

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# **Performance Report**

Period: Quarter 2, 2018/19

## **Contents**

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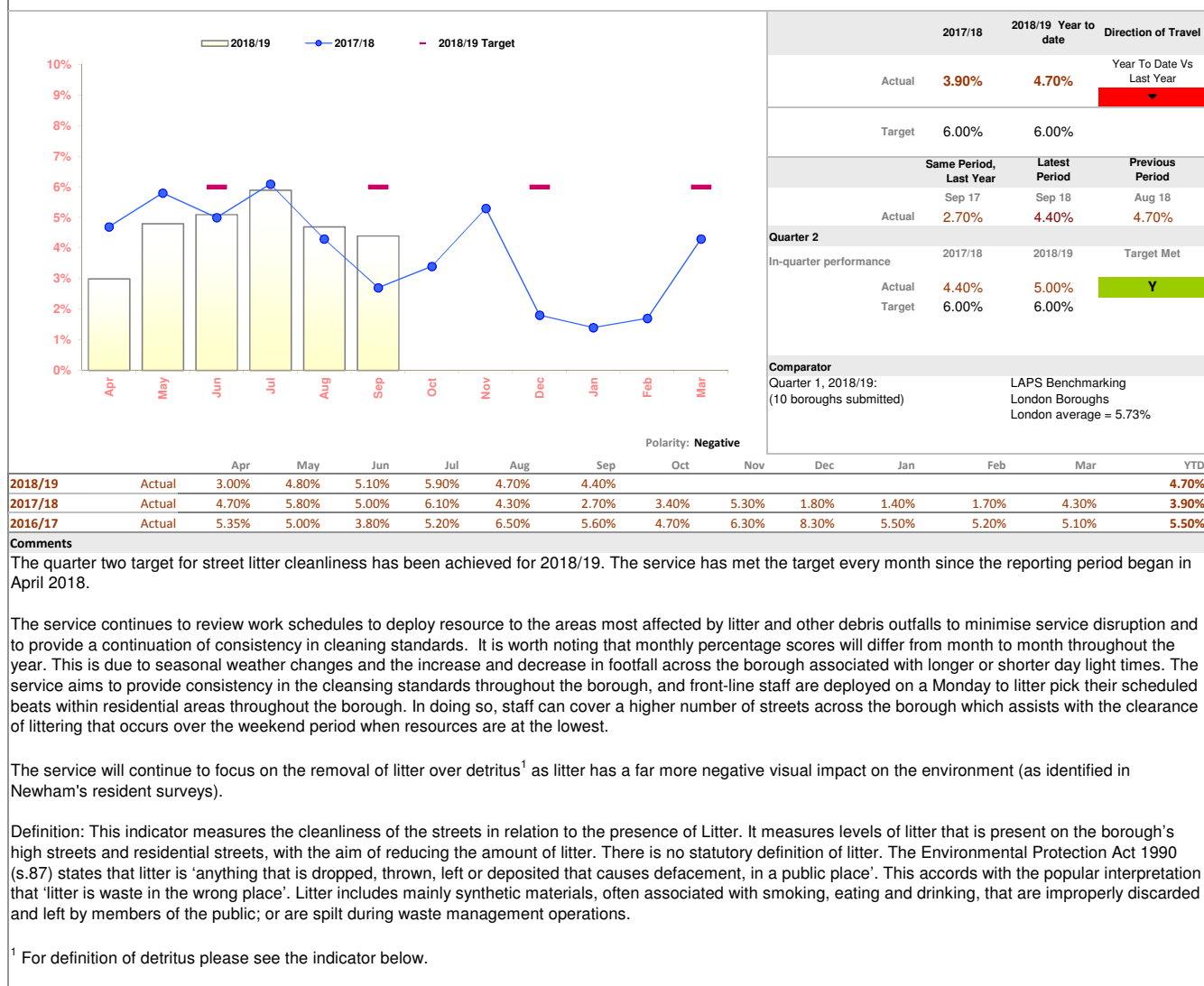
1. Environment & Regeneration .....	3
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## **Environment and Regeneration**



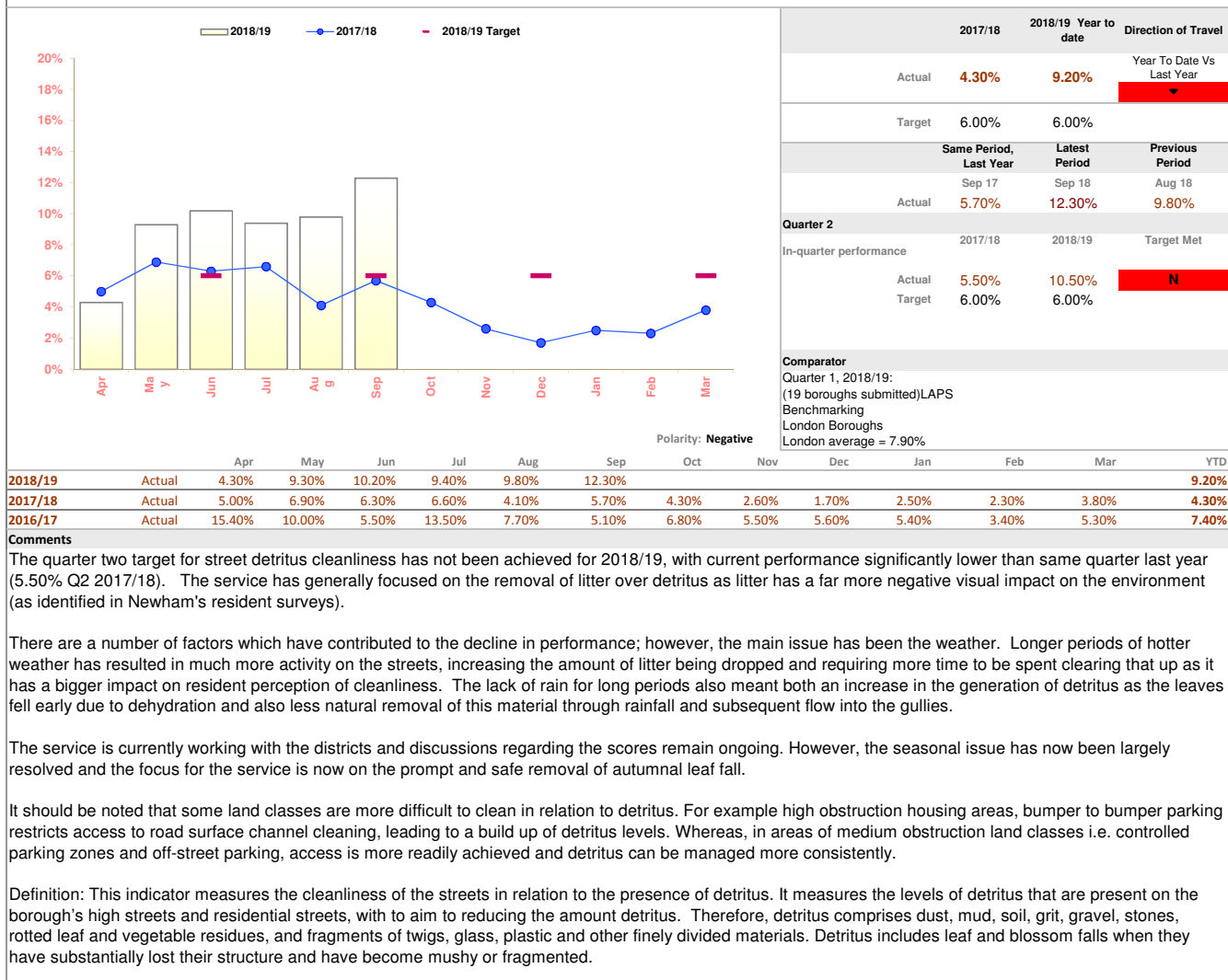
# Street, estate and environmental cleanliness – Local Environmental Quality Index (LEQs): **Litter**

Definition: Percentage of sites inspected falling below the acceptable level of Litter



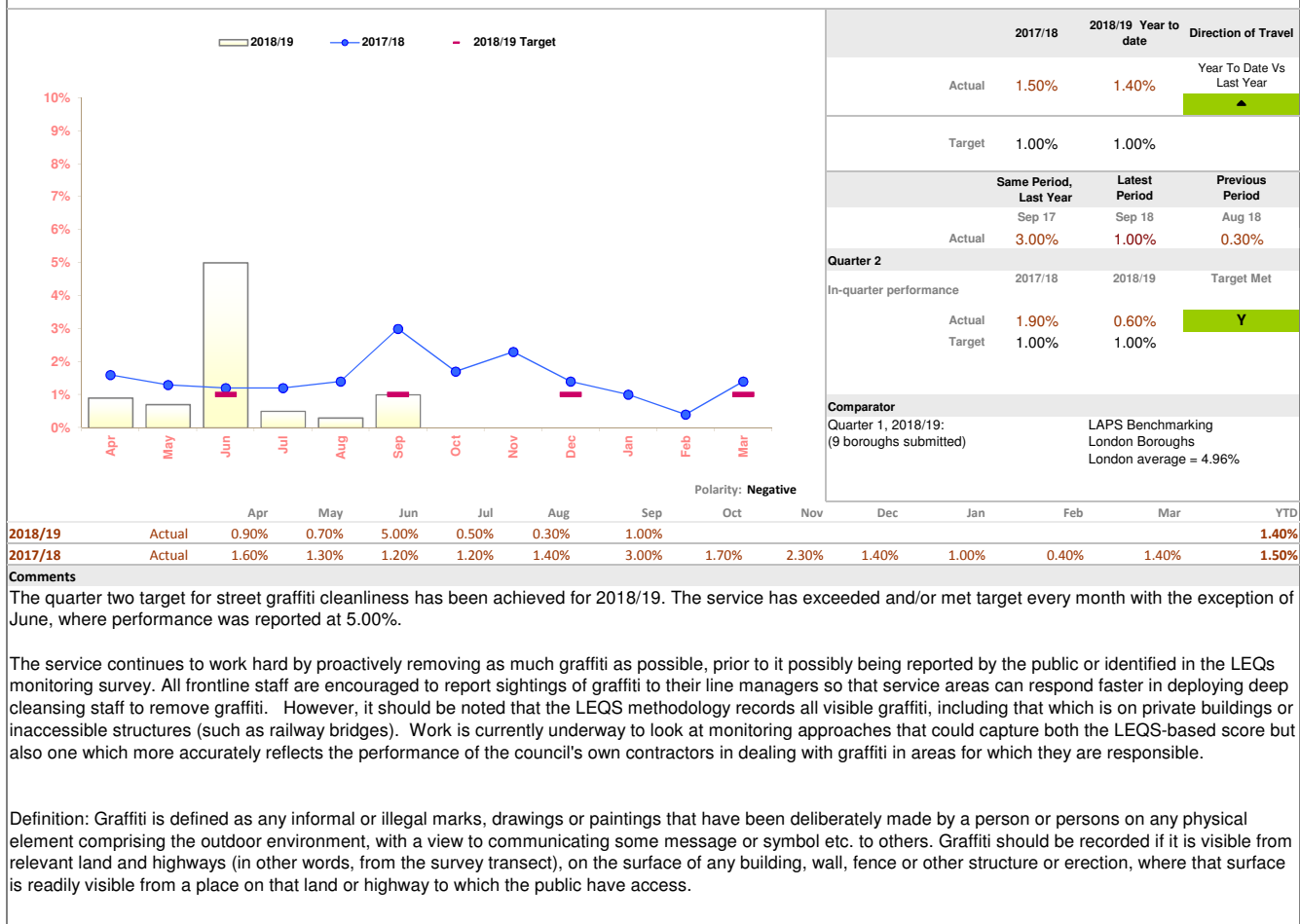
Street, estate and environmental cleanliness – Local Environmental Quality Index (LEQs): **Detritus**

Definition: Percentage of sites inspected falling below the acceptable level of Detritus



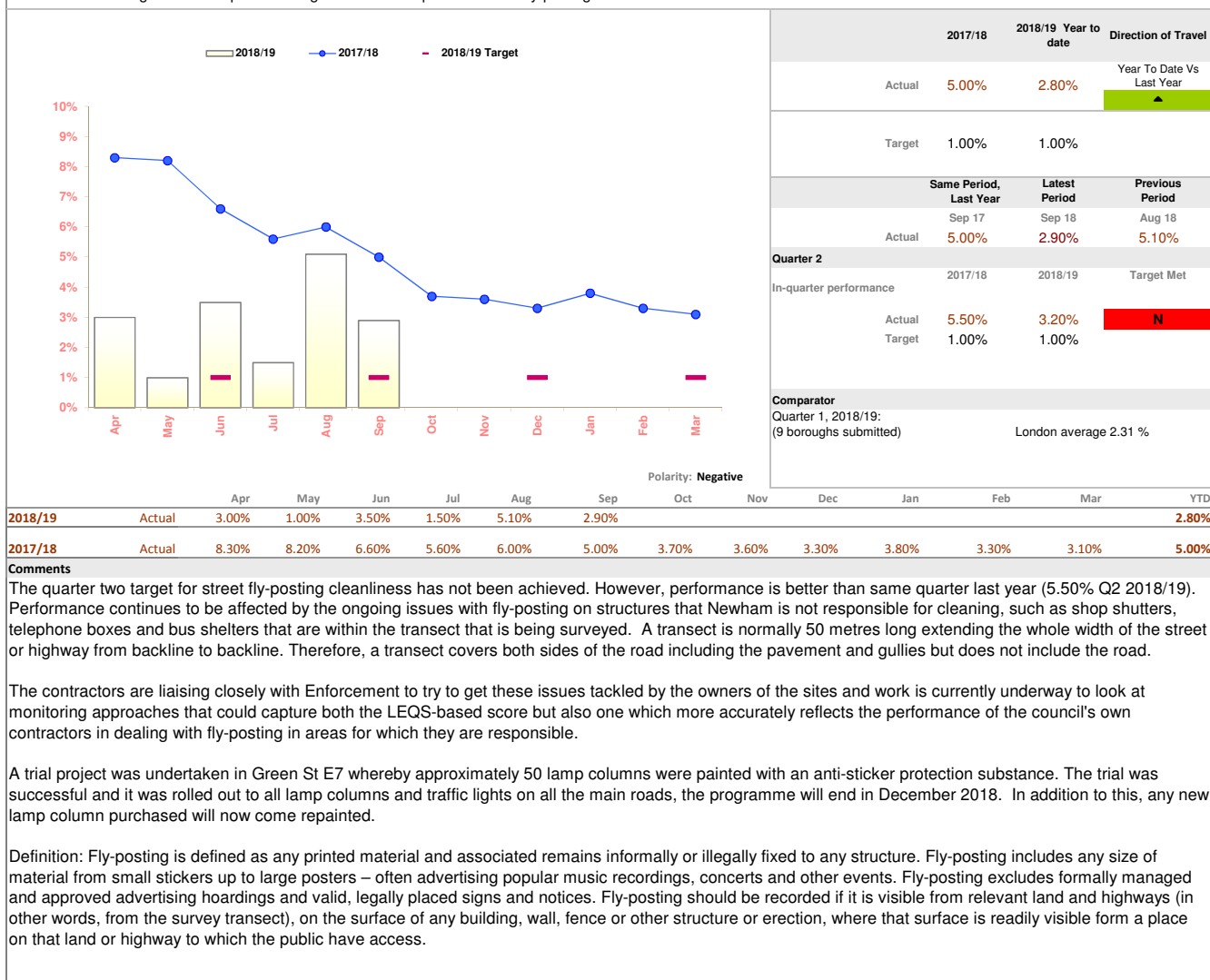
Street, estate and environmental cleanliness – Local Environmental Quality Index (LEQs): **Graffiti**

Definition: Percentage of sites inspected falling below the acceptable level of Graffiti



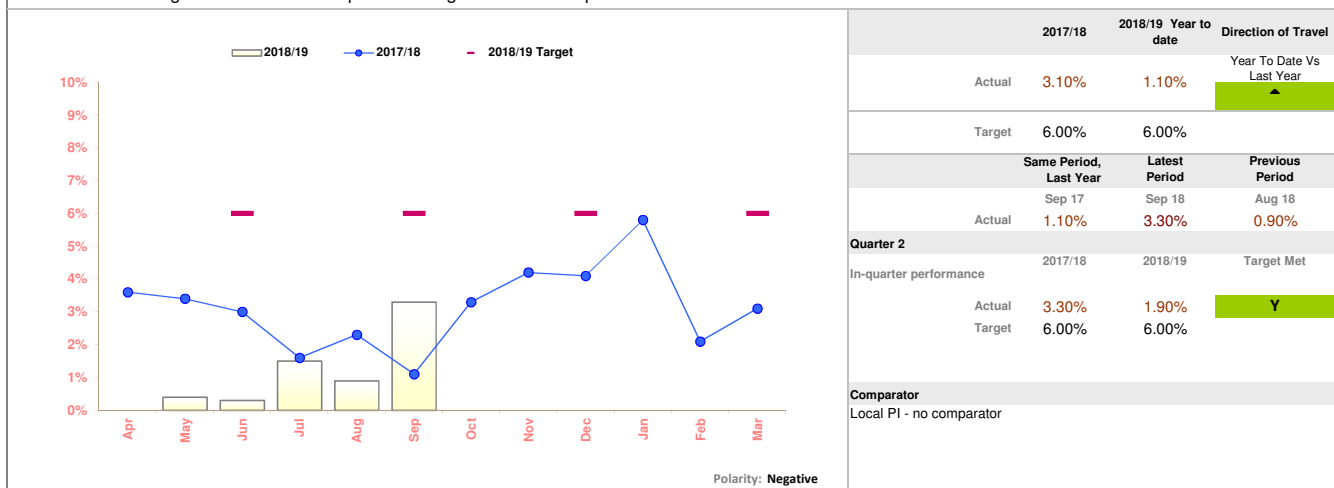
Street, estate and environmental cleanliness – Local Environmental Quality Index (LEQs): **Fly-posting**

Definition: Percentage of sites inspected falling below the acceptable level of Fly-posting



Street, estate and environmental cleanliness – Local Environmental Quality Index (LEQs): **Estates External Litter**

Definition: Percentage of estates sites inspected falling below the acceptable level of Litter



	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19 Actual	0.00%	0.40%	0.30%	1.50%	0.90%	3.30%							1.10%
2017/18 Actual	3.60%	3.40%	3.00%	1.60%	2.30%	1.10%	3.30%	4.20%	4.10%	5.80%	2.10%	3.10%	3.10%

## Comments

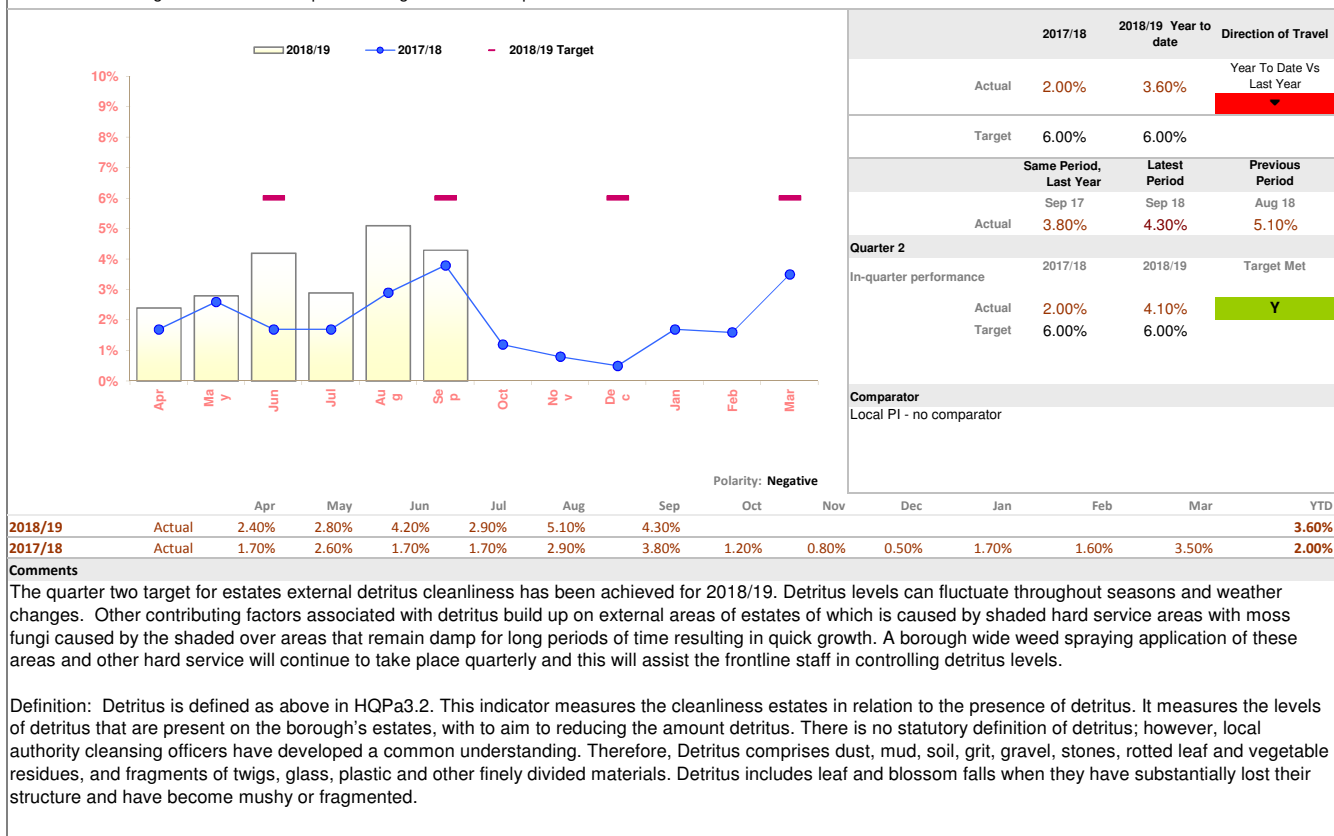
The quarter two target for estates external litter cleanliness has been achieved for 2018/19.

The service continues to provide high levels of external cleansing to estates across the borough. It is reviewing service requirements to provide the most effective ways to deploy frontline services to deliver the outcomes required. The focus will be on the continuation of scheduling and reviewing work tasks to improve and sustain good performance. The service continues to collate information on blocks with high levels of Anti-Social-Behaviour and high levels of littering so that they can be closely monitored and resources can be deployed to those blocks on a more frequent basis.

Definition: Litter is defined as above in HQPa3.1. However, this indicator measures the cleanliness of the streets in relation to the presence of Litter in the external features of the blocks such as hard surfaces, grassed and shrub areas with the aim to reducing the amount litter. There is no statutory definition of litter. The Environmental Protection Act 1990 (s.87) states that litter is 'anything that is dropped, thrown, left or deposited that causes defacement, in a public place'. This accords with the popular interpretation that 'litter is waste in the wrong place'. Litter includes mainly synthetic materials, often associated with smoking, eating and drinking, that are improperly discarded and left by members of the public; or are spilt during waste management operations.

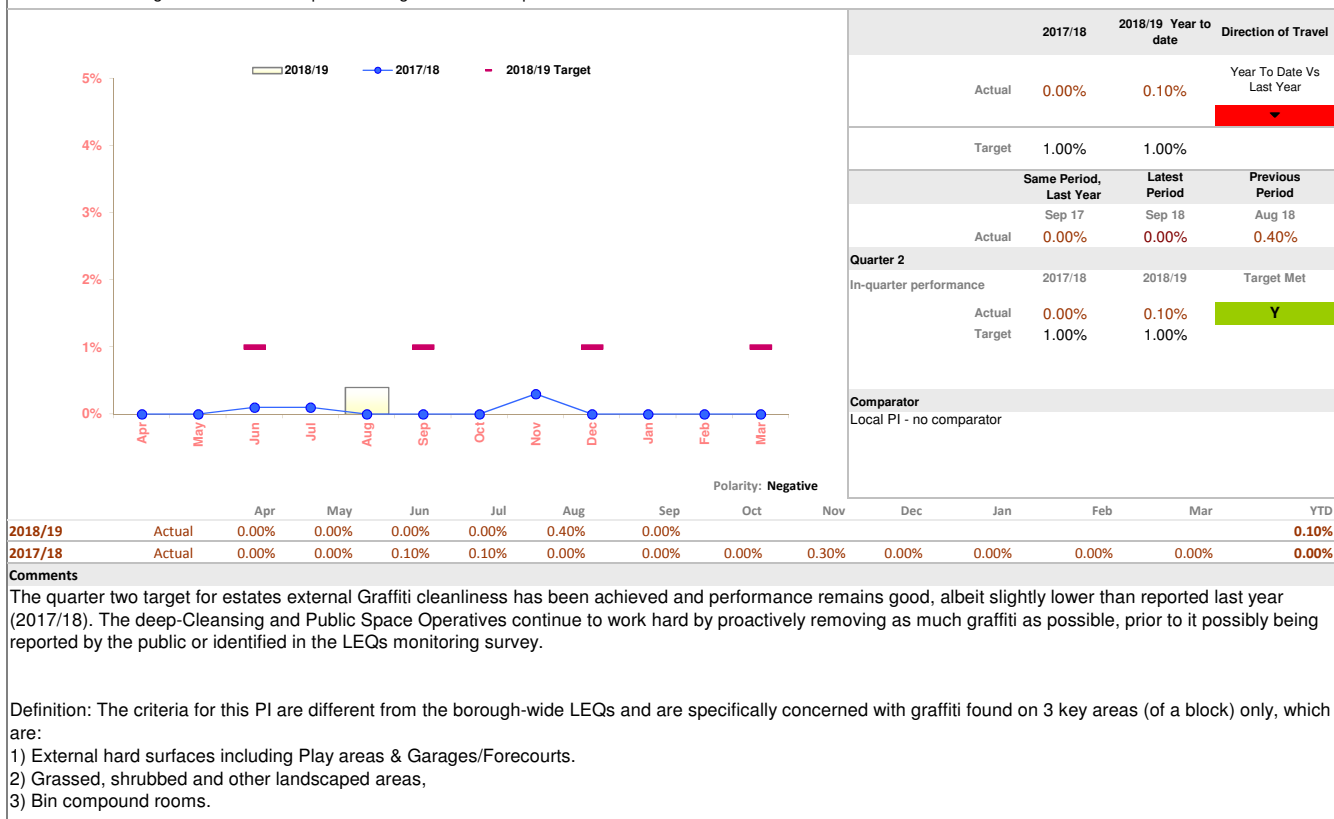
# Street, estate and environmental cleanliness – Local Environmental Quality Index (LEQs): **Estates External Detritus**

Definition: Percentage of estates sites inspected falling below the acceptable level of Detritus



Street, estate and environmental cleanliness – Local Environmental Quality Index (LEQs): **Estates External Graffiti**

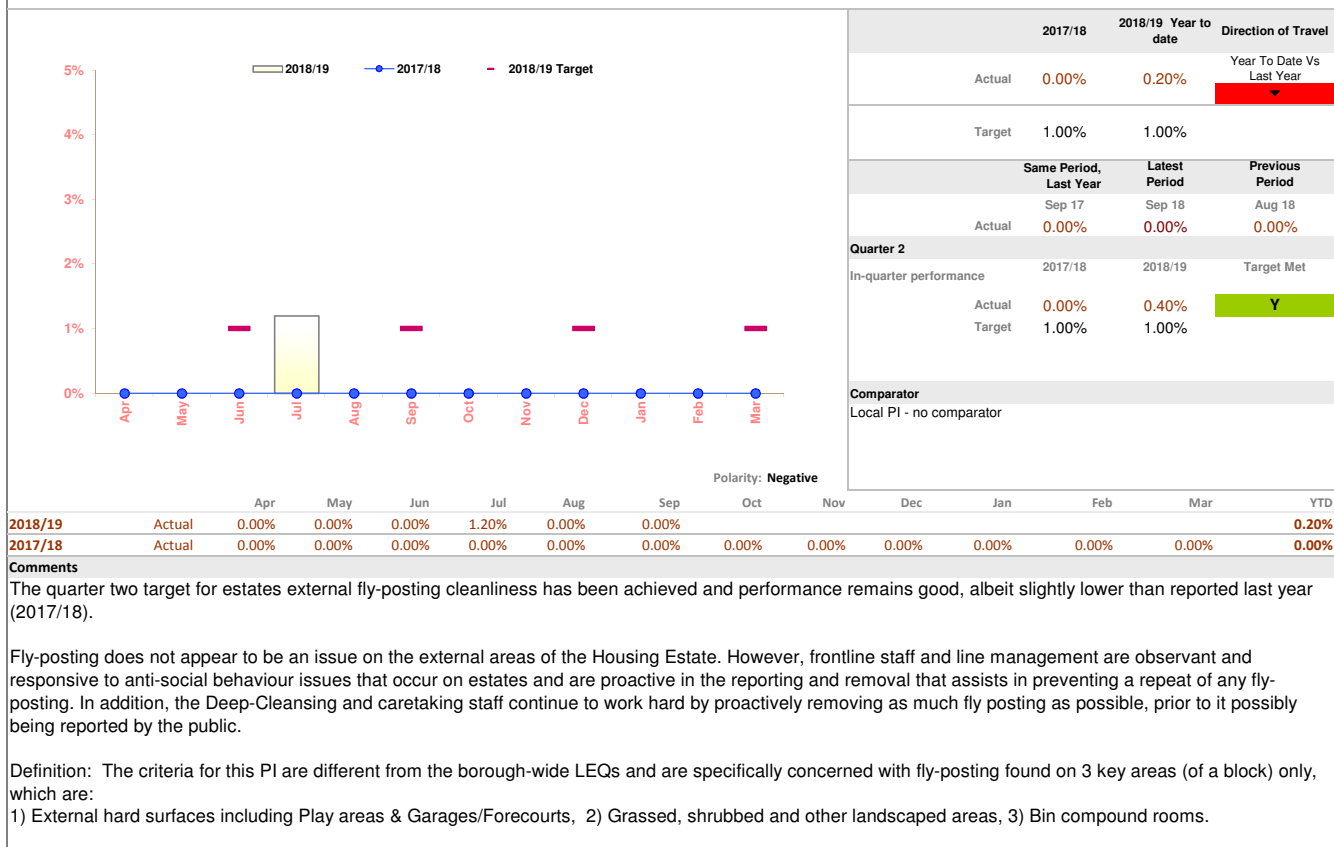
Definition: Percentage of estates sites inspected falling below the acceptable level of Graffiti





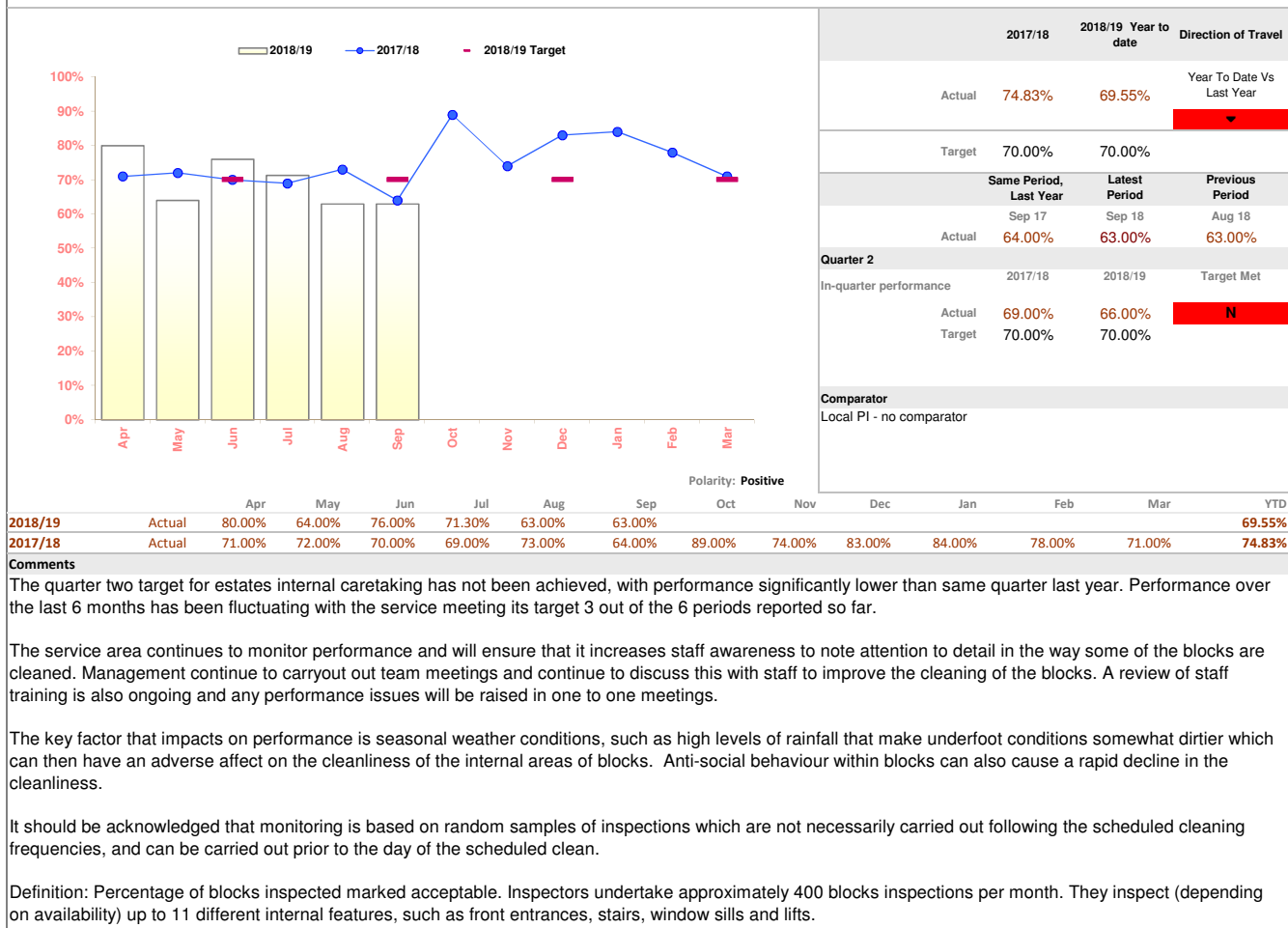
Street, estate and environmental cleanliness – Local Environmental Quality Index (LEQs): **Estates External Fly-posting**

Definition: Percentage of estates sites inspected falling below the acceptable level of Fly-posting

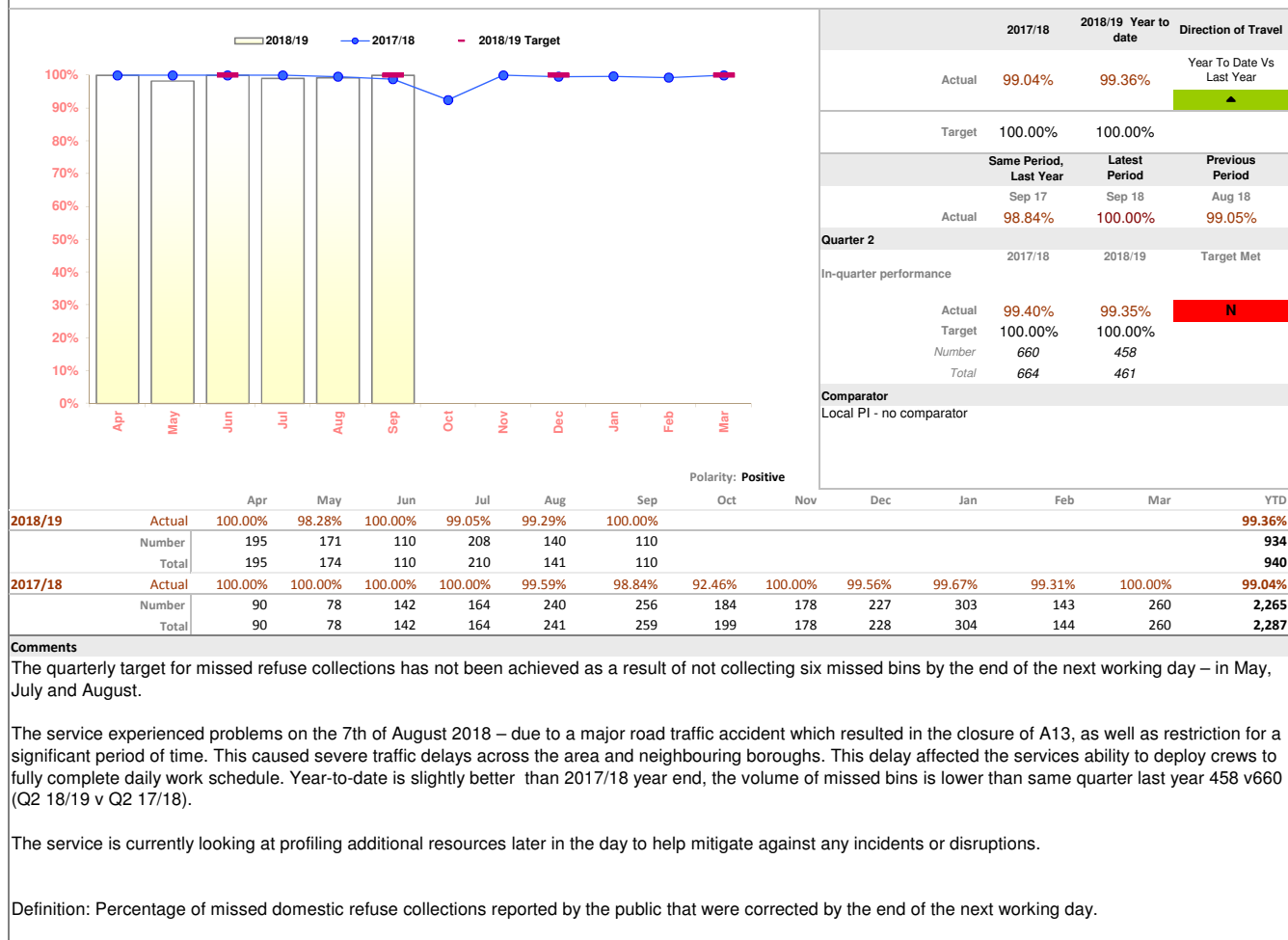


Street, estate and environmental cleanliness – Local Environmental Quality Index (LEQs): **Estates Internal Caretaking**

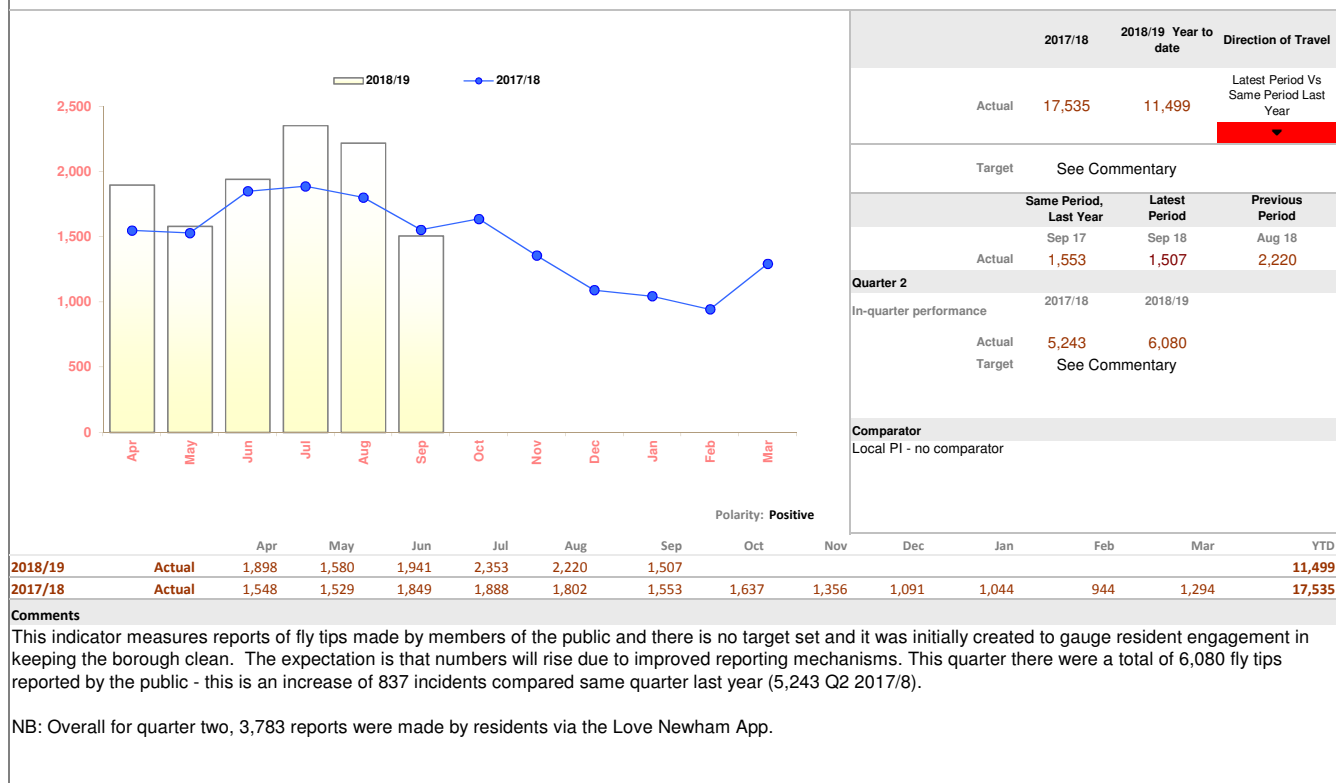
Definition: Percentage of blocks inspected marked acceptable



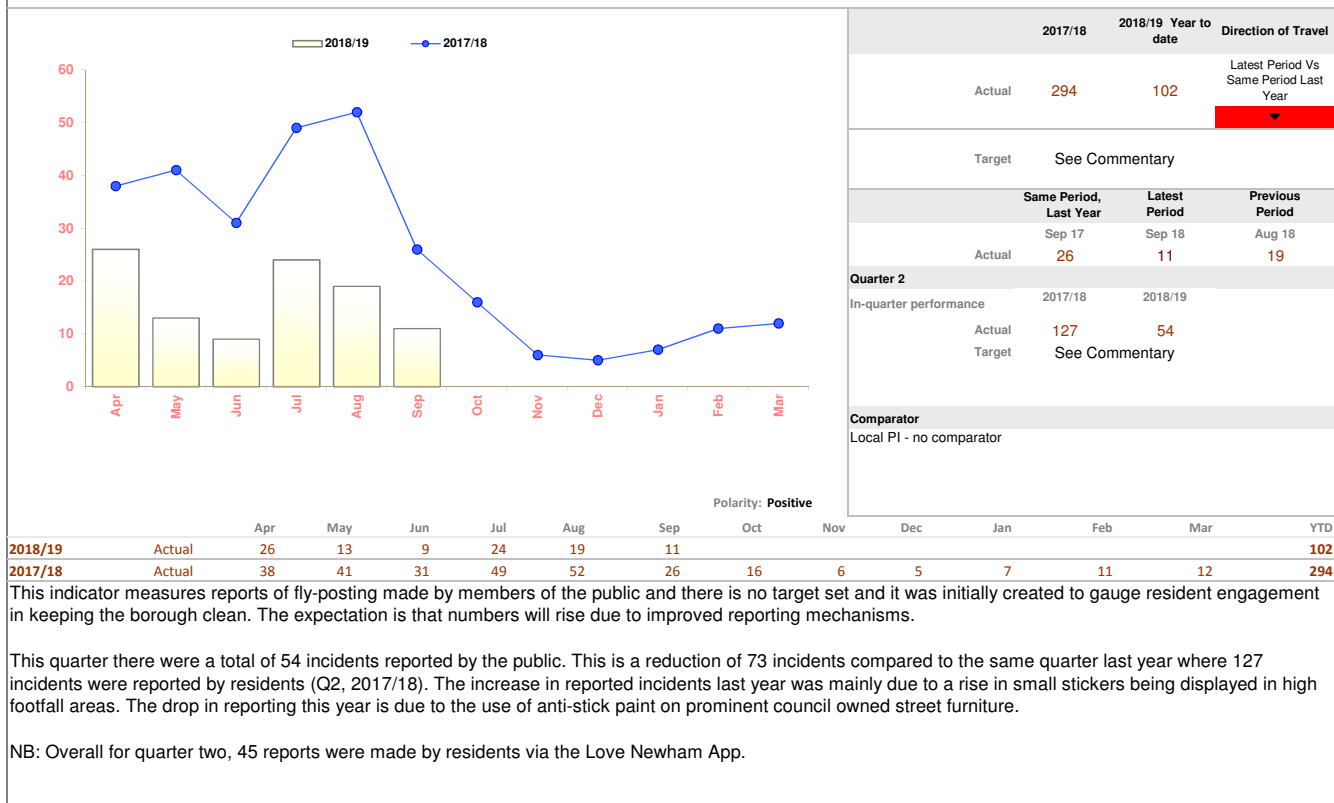
Percentage of missed domestic refuse collections reported by the public which were corrected by the end of the next working day  
(Formerly known as SSE2a)



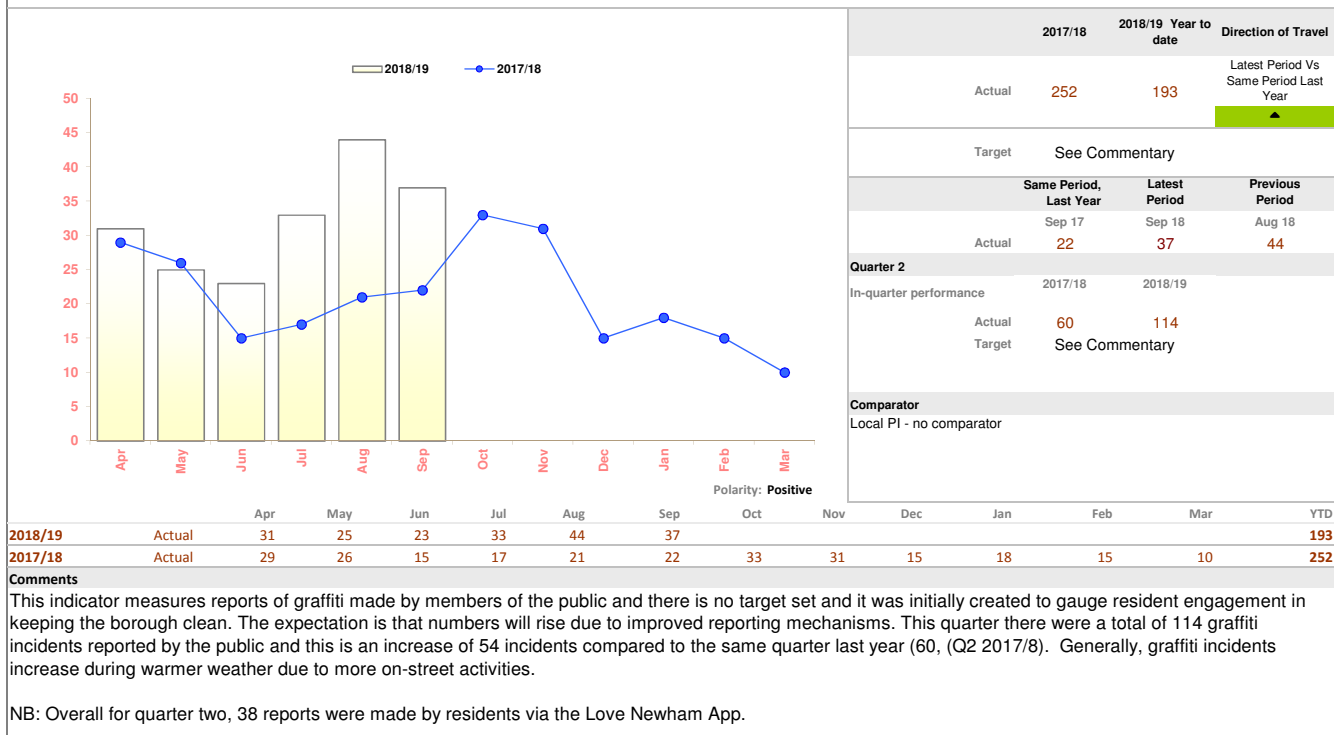
## Number of fly tips reported by the public



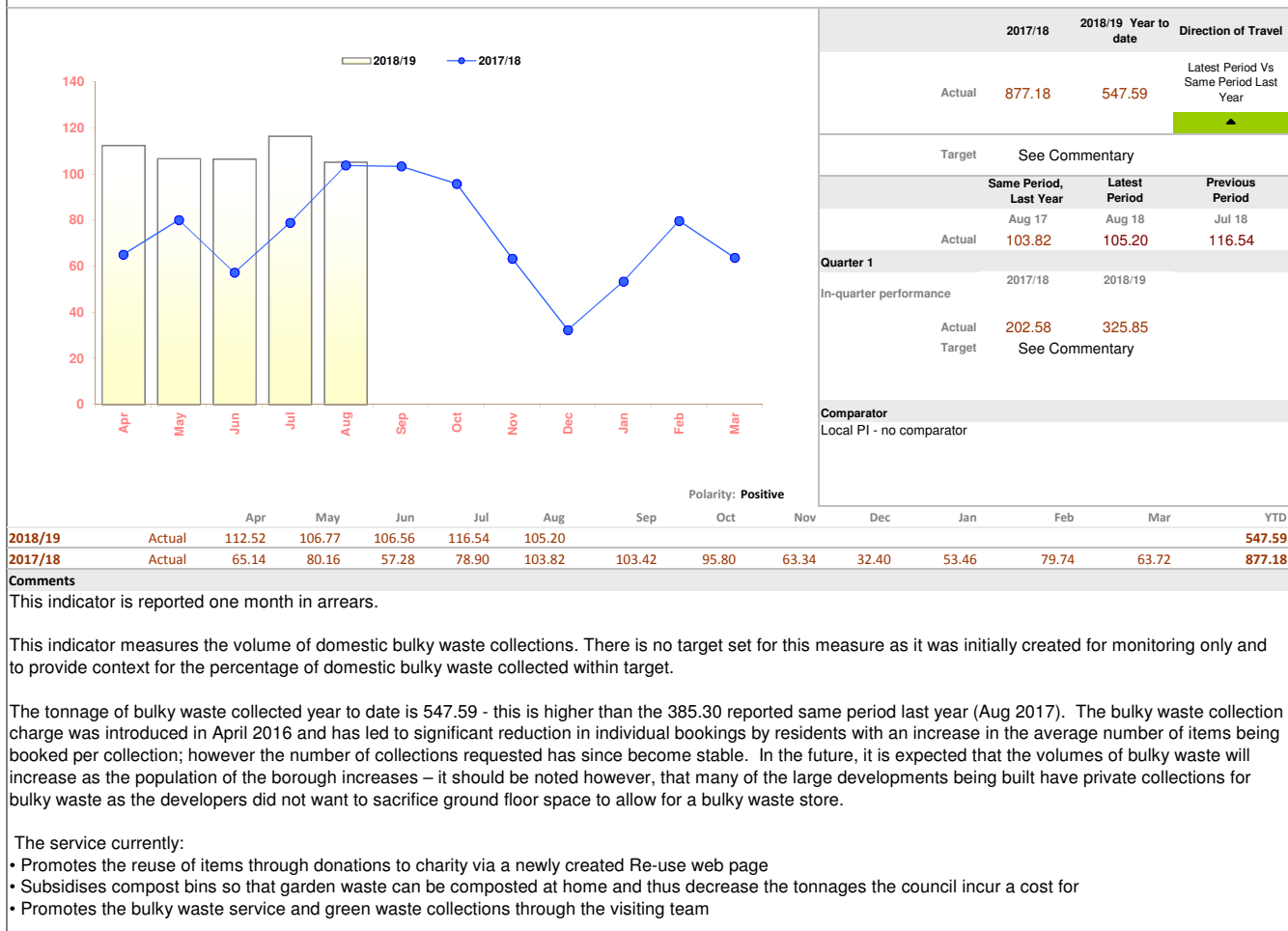
## Number of fly-posting incidents reported by the public



Number of graffiti incidents reported by the public

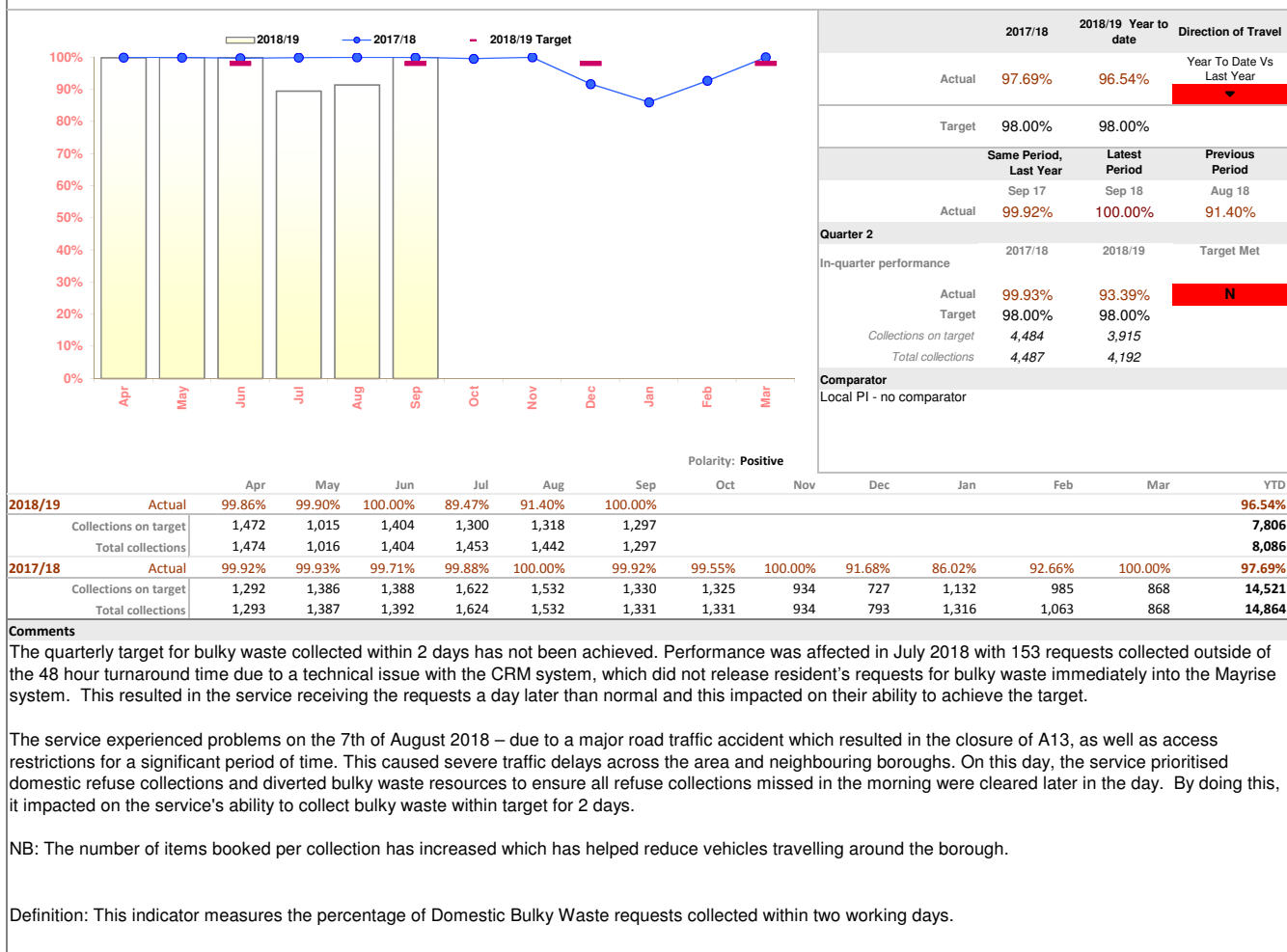


# Volume of Domestic Bulky Waste collections (Tonnage)

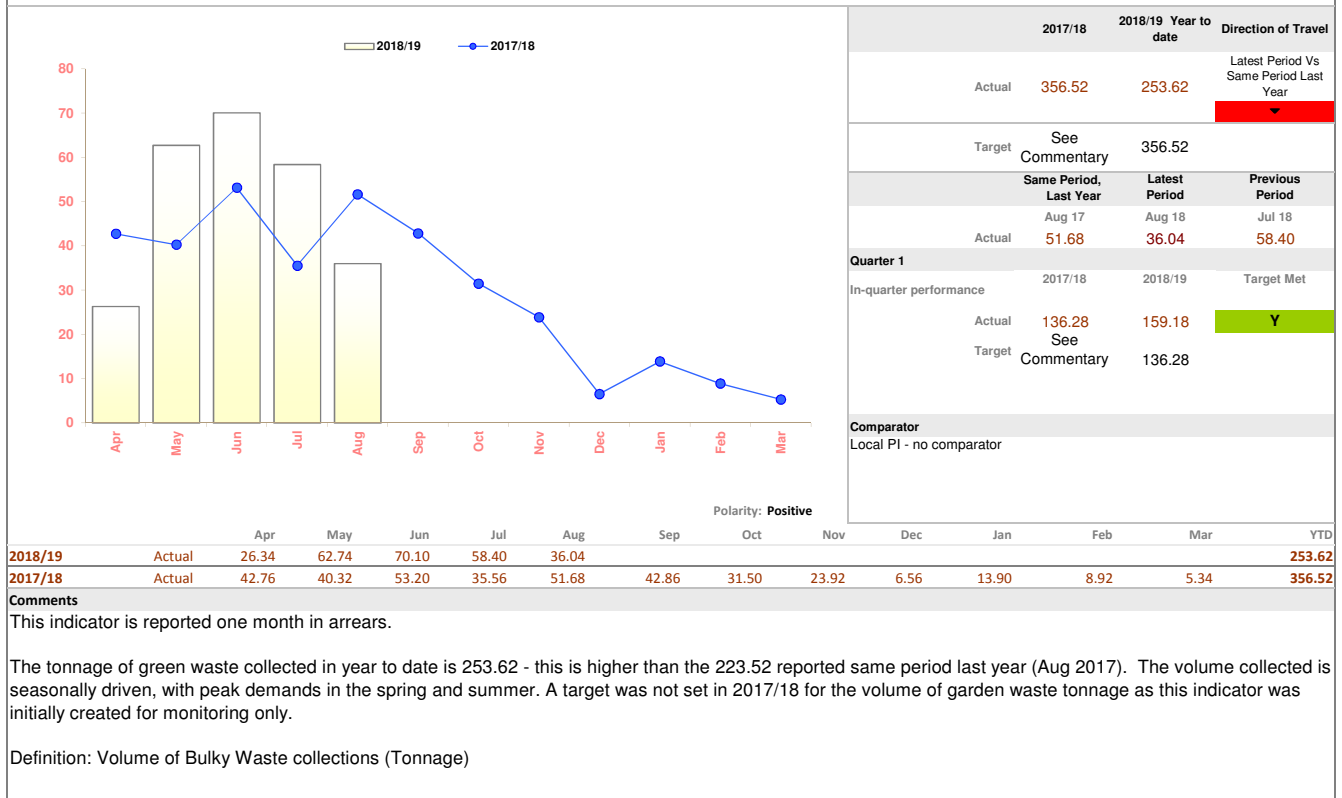




## Percentage of Domestic Bulky Waste collected within target (2 working days)

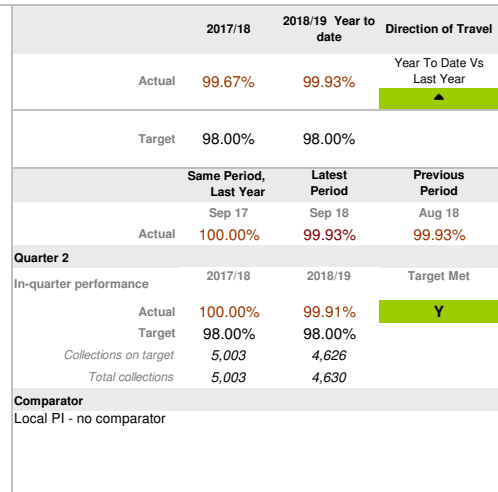


## Volume of Domestic Green waste collection (Tonnage)



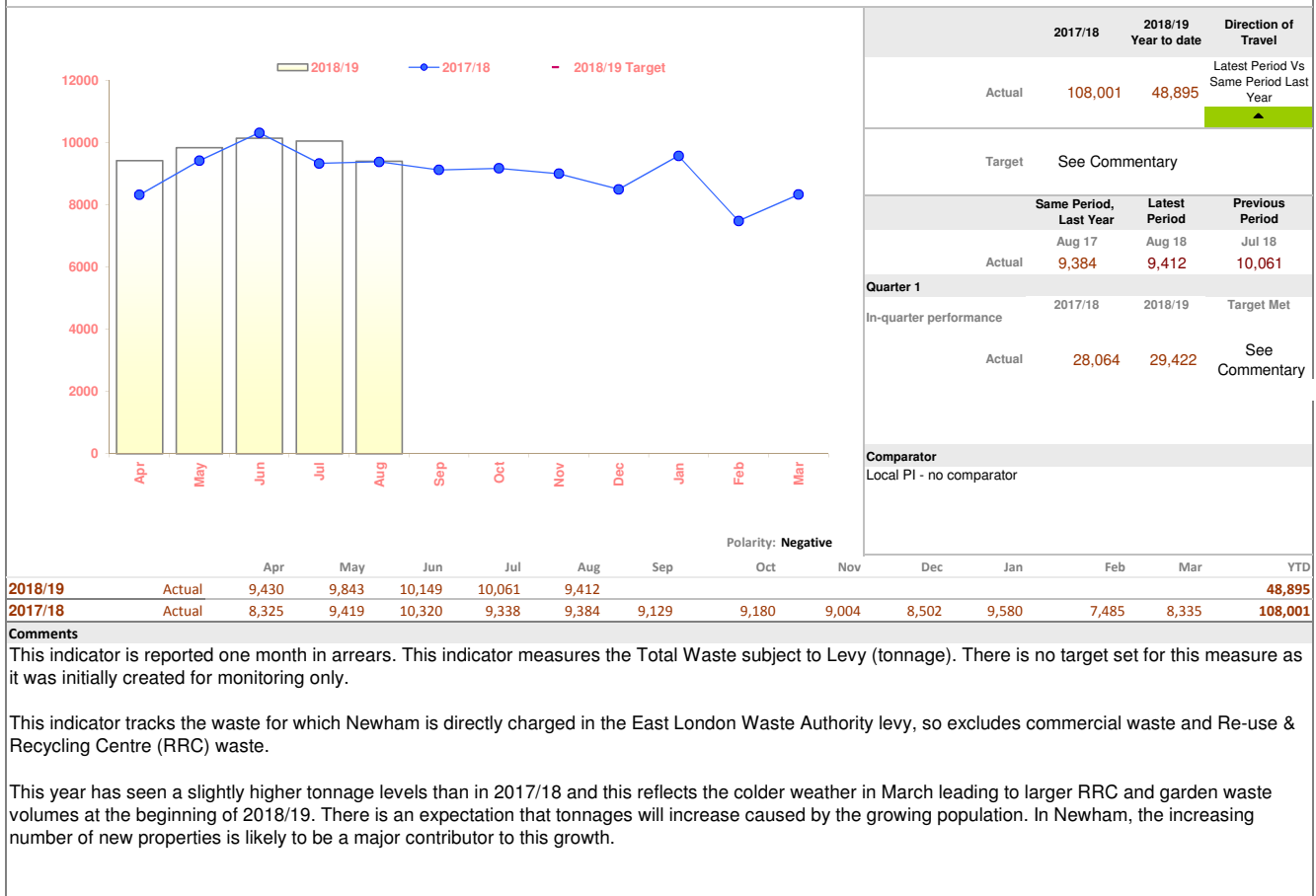
	2017/18	2018/19 Year to date	Direction of Travel
Actual	356.52	253.62	Latest Period Vs Same Period Last Year
Target	See Commentary	356.52	
	Same Period, Last Year	Latest Period	Previous Period
	Aug 17	Aug 18	Jul 18
Actual	51.68	36.04	58.40
<b>Quarter 1</b>			
In-quarter performance	2017/18	2018/19	Target Met
Actual	136.28	159.18	Y
Target	See Commentary	136.28	
<b>Comparator</b>			
Local PI - no comparator			

		Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19	Actual	26.34	62.74	70.10	58.40	36.04								253.62
2017/18	Actual	42.76	40.32	53.20	35.56	51.68	42.86	31.50	23.92	6.56	13.90	8.92	5.34	356.52



<p><b>Comments</b></p> <p>Performance for green waste collected within target remains excellent and the service has met the quarterly target of 98.00% for the percentage of domestic green waste collected.</p> <p>Definition: This indicator measures the percentage of Domestic Green Waste requests collected within two working days.</p>
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## Total Waste subject to Levy (tonnage).

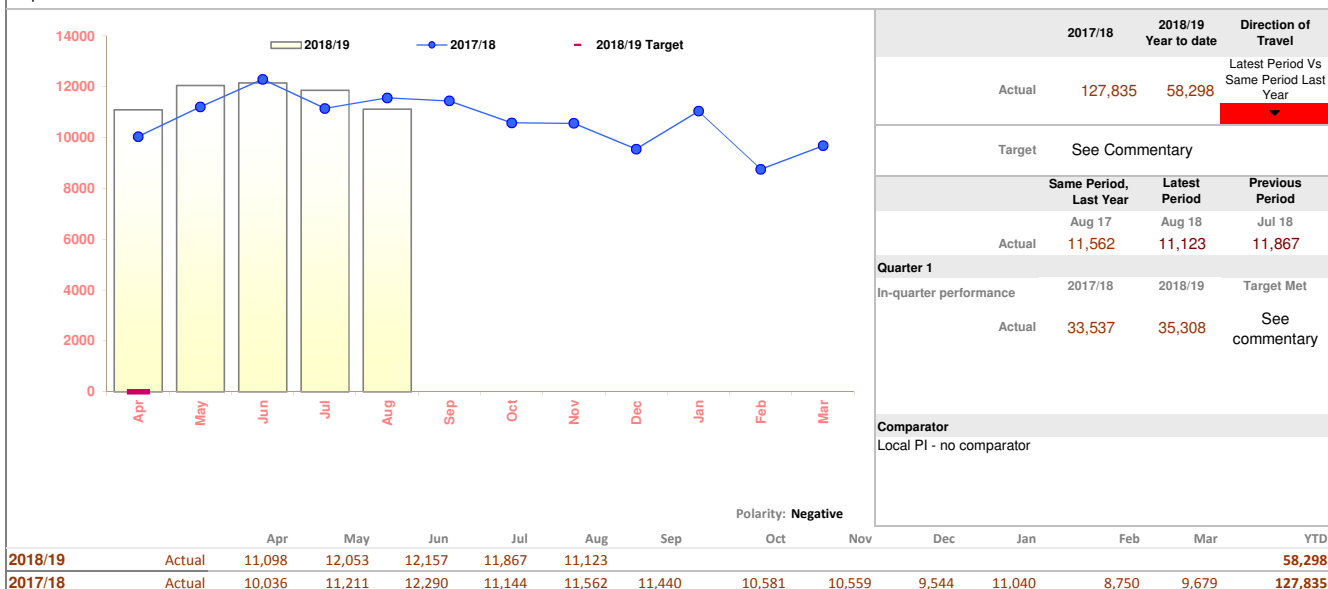


# Percentage of Household Waste sent for Reuse, Recycling, or Composting.



## Monthly total waste (Tonnage)

Reported one month in arrears.



## Comments

This indicator is reported one month in arrears. This indicator measures the Total Monthly Waste (tonnage). There is no target set for this measure as it was initially created for monitoring only.

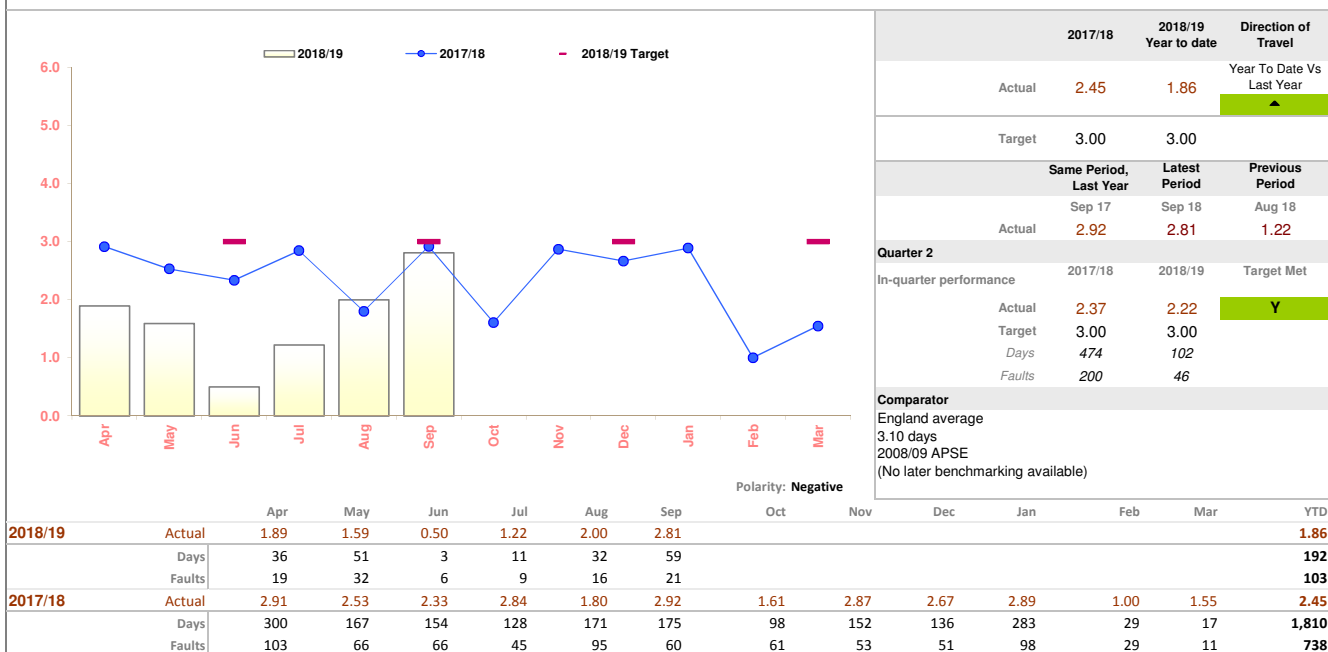
This indicator tracks all waste associated with Newham, including collected household waste, fly tipping, commercial waste and waste from the Re-use & Recycling Centre (RRC). Commercial waste is either re-charged back to the customers or paid for out of a separate budget – such as the gully waste. The RRC waste is apportioned to the borough (along with other East London Waste Authority charges and costs) according to a measure of the tax base.

There is an expectation that tonnages will increase caused by the growing population. In Newham, the increasing number of new properties is likely to be a major contributor to this growth, 2018/19 to date has a slighter higher tonnage than the same periods in 2017/18 and this reflects the colder weather in March leading to larger RRC and garden waste volumes at the beginning of 2018/19.

Commercial waste tonnage has increased as the number of customers has surpassed 2300. The team have also had some success in revising up the agreements for some existing customers. This generates a surplus income to LBN.

## SLF

Average time taken to repair street light fault where response time is under control of the local authority (working days)

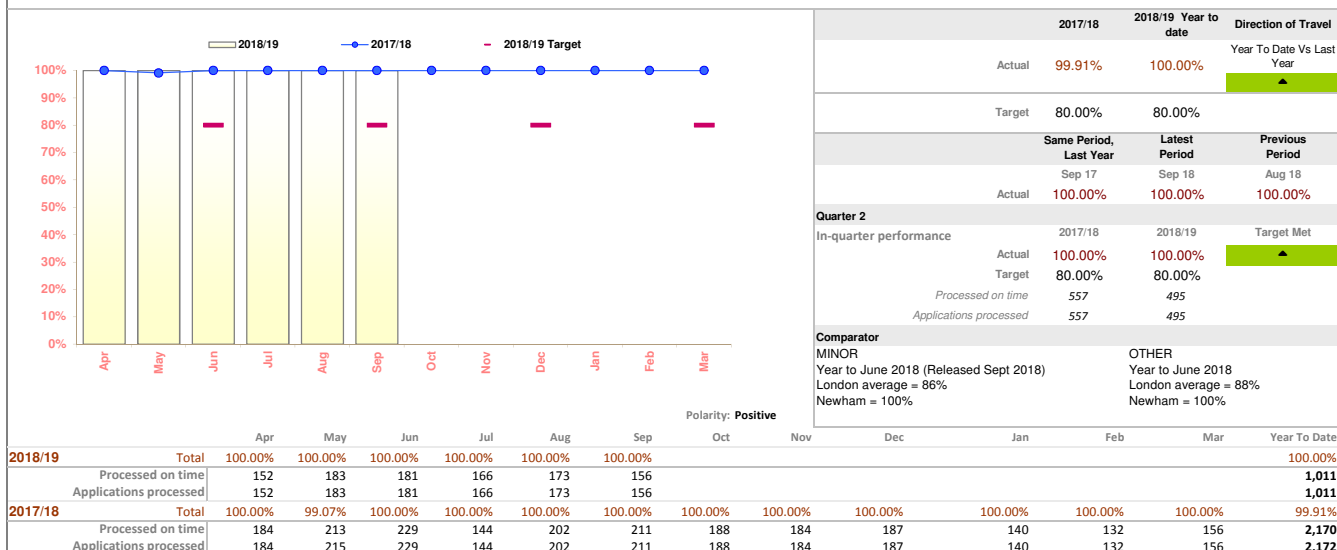


## Comments

The service has exceeded the quarterly performance target with a 2.22 day outturn against a target of 3.00 day turnaround time. It is estimated that the maintenance response time will stay below the set 3 days for the rest of the current financial year. This is a direct result of the LED investment programme. The LED investment programme started in 2016 and the aim of the project is to upgrade all highway lighting to LEDs. The work includes replacing lamp heads with modern LED lanterns with Central Monitoring capacity (each lamp head can now be remotely monitored). On completion the council will achieve 50% savings on highway lighting energy consumption. There will be less maintenance visits as modern LED lamp heads last longer than conventional light sources.

NB: Street Light Fault report includes all illuminated highway furniture, street lights, belisha beacons, zebra crossing beacons, illuminated signs, illuminated bollards, subway and underpass light.

## Processing of planning applications - minor and other



## Comments

Please note that this data is for local monitoring only. Data on planning applications is submitted quarterly to the Ministry for Housing, Communities and Local Government (MHCLG) who then validate, adjust and publish this data. Please see [www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics](http://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics) for further details.

The data provided here is indicative only and is made up of year to date performance for:

Minor Planning Applications = 100% (276 of 276) determined on time in period April - September 2018.

Other Planning Applications = 100% (339 of 339) determined on time in period April - September 2018.

Certificates of Lawfulness of Existing Use / Development (CLEs) and Certificates of Lawfulness of Proposed Use / Development (CLPs) = 100% (336 of 336) determined on time in period April - September 2018.

The Ministry of Housing, Communities & Local Government collect and publish local planning authority performance tables on a quarterly basis. The latest versions of the tables were published on 23 August 2018.

The criteria for assessing local planning authority performance in determining applications for major and non-major development is set by government. A local planning authority can be designated if the Secretary of State for Housing, Communities and Local Government considers that there are respects in which the authority is not adequately performing its function.

The performance of local planning authorities is assessed separately against:

- The speed of determining applications for major development;
- The quality of decisions made by the authority on applications for major development;
- The speed of determining applications for non-major development;
- The quality of decisions made by the authority on applications for non-major development.

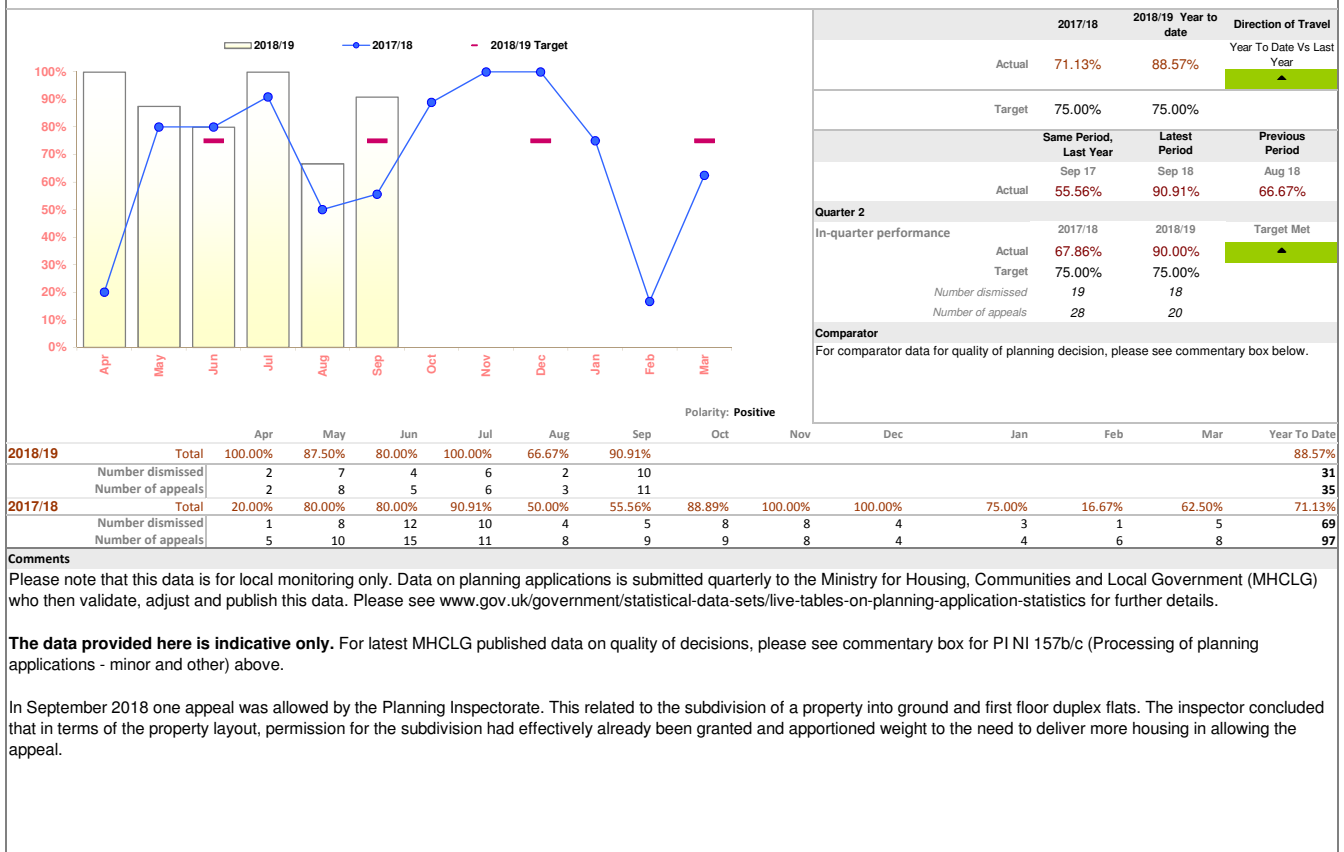
The table below provides an overview of the thresholds and assessment periods for designation in 2017 and 2018 as sent by government.

Measure and type of Application	2017 Threshold and assessment period	2018 Threshold and assessment period
Speed of major Development	50% (October 2014 to September 2016)	60% (October 2015 to September 2017)
Quality of major Development	N/A	10% (April 2015 to March 2017)
Speed of non-major Development	65% (October 2014 to September 2016)	70% (October 2015 to September 2017)
Quality of non-major Development	N/A	10% (April 2015 to March 2017)

Details for the designation in 2019 have not yet been published.

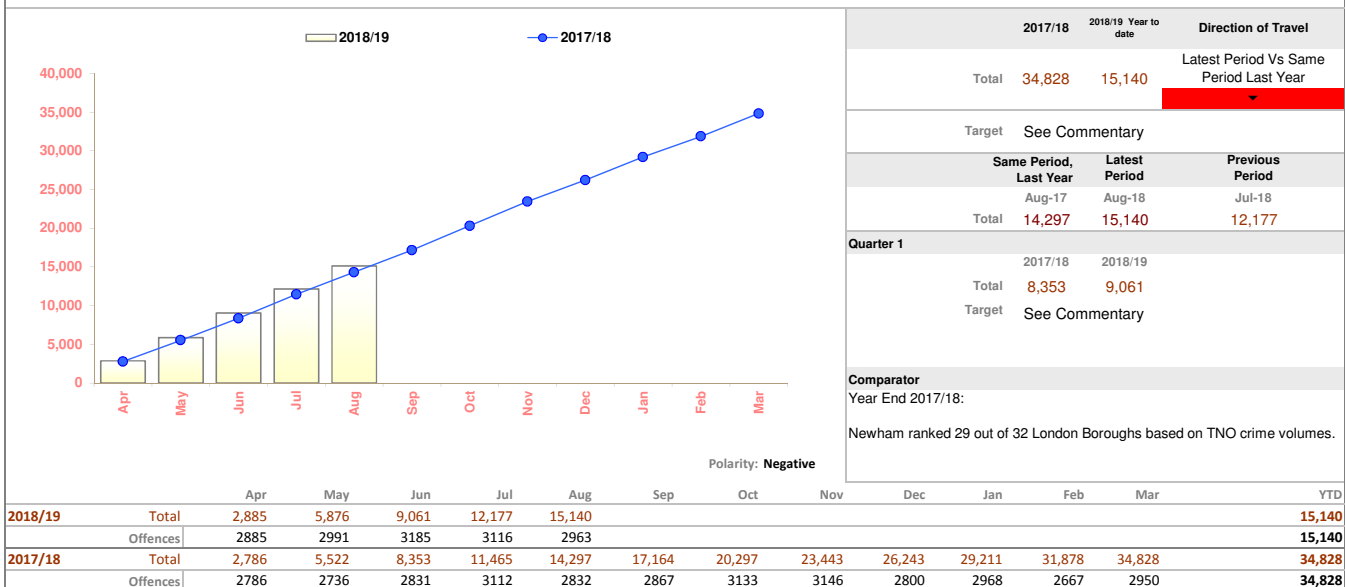


## Planning appeals: percentage dismissed



## Crime levels (Police) - Total Notifiable offences (TNOs)

## Cumulative Indicator



## Comments

## Current Performance

Performance for the current year shows a 5.90% increase in offences (843 offences) when compared with the same cumulative period last year (15140 vs 14297). Current monthly performance shows a 4.63% increase in TNOs (131 offences) when compared with the same period last year (2963 vs 2832).

## Actions and Activity

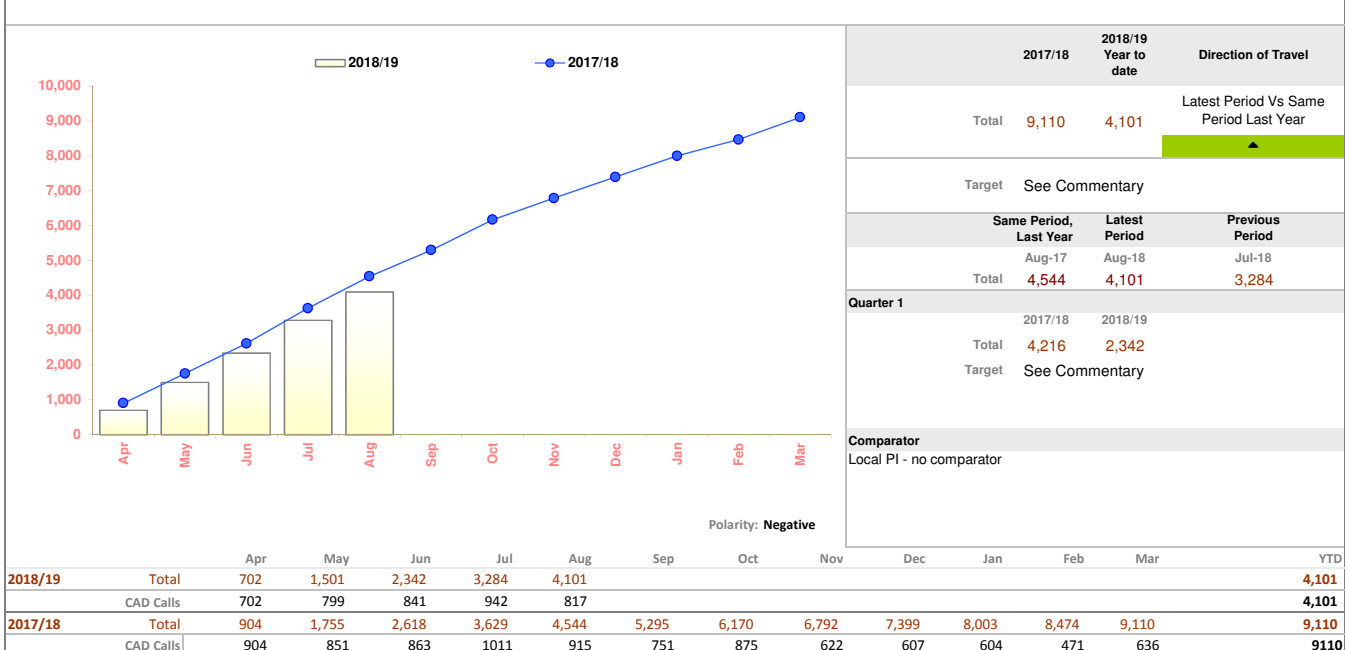
This indicator reports the total number of Notifiable offences recorded by Metropolitan Police service (MPS), which is widely used as a measure of overall crime. There are no targets set by the Mayor's Office for Policing and Crime (MOPAC).

## Definition and Context

A combined total of all incidents reported to the Metropolitan Police Service that results in an offence being recorded and widely used as a measure of overall crime. Crime statistics are a live data set, and change in real-time as crimes are re-classified. Therefore, each month that data is presented, all months for last year and this year are updated where necessary. This means the current year data will provide slight variances from previous months. This explains why there are differences between the latest performance sheet and any previously published sheets: the current month's data (including all historic data on this sheet) are therefore the most up-to-date available. Offence categories include: 01. Theft and Handling, 02. Violence Against the Person, 03. Burglary, 04. Criminal Damage, 05. Drugs, 06. Robbery, 07. Sexual Offences, 08. Other Notifiable, 09. Fraud.

## Anti-social Behaviour (ASB) levels - Police recorded CAD (Computer Aided Dispatch) calls

## Cumulative Indicator



## Comments

## Current Performance

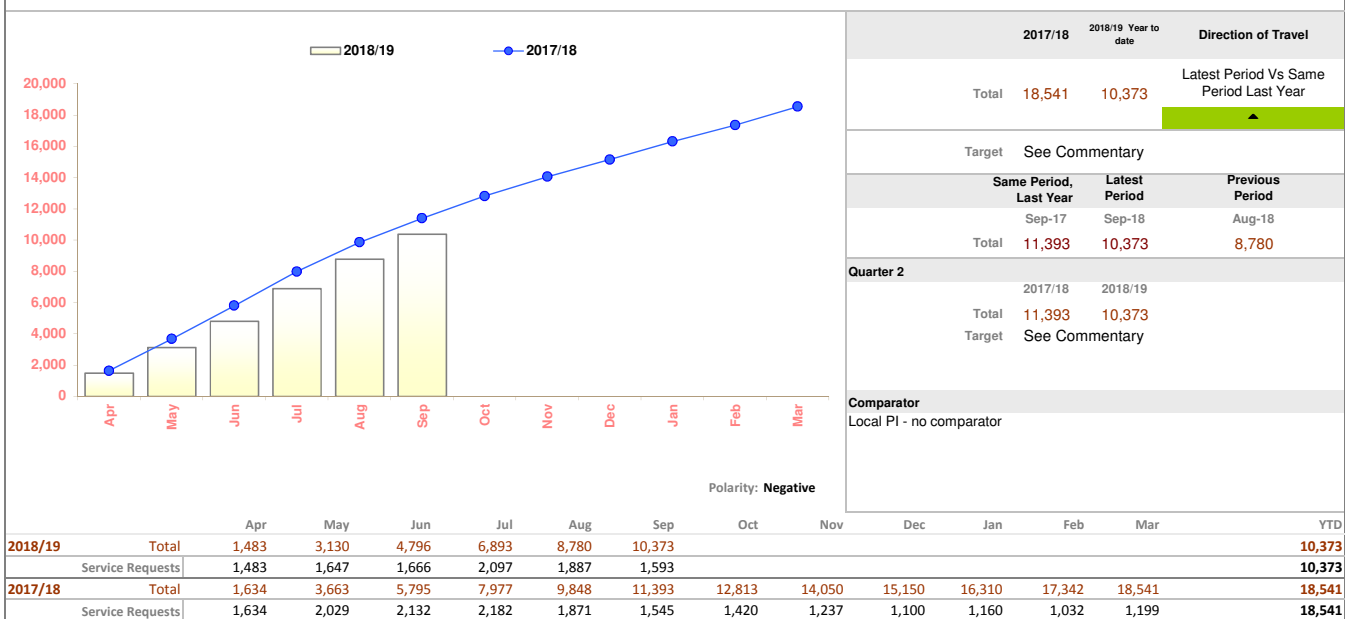
Performance for the current year, to date, shows a decrease in police recorded ASB, -9.7%, (-443 calls) when compared with the same cumulative period last year (4101 vs 4544). In comparison council reported ASB has seen a decrease by -9.0% (-1020 calls) when compared with the same period last year, see the following indicator. Monthly performance shows a -10.7% decrease in police recorded CAD ASB calls (-98 calls) when compared with the same period last year (817 vs 915).

## Definition and Context

Note these are calls received regarding ASB, not offences detected. CAD - ASB (Opening codes 1/2/3 = Code 11 Drug Offences or one of the Home Office ASB codes 200-216). Definition; ASB calls are recorded and dealt with in the police CAD (Computer Aided Despatch) control room and includes drugs, fireworks, nuisance/rowdy/inconsiderate behaviour, street drinking, prostitution, etc. There are no targets set by the Mayor's Office for Policing and Crime (MOPAC).

## Anti-social Behaviour (ASB) levels - Council recorded, reactive, external ASB service requests

## Cumulative Indicator



## Comments

## Current Performance

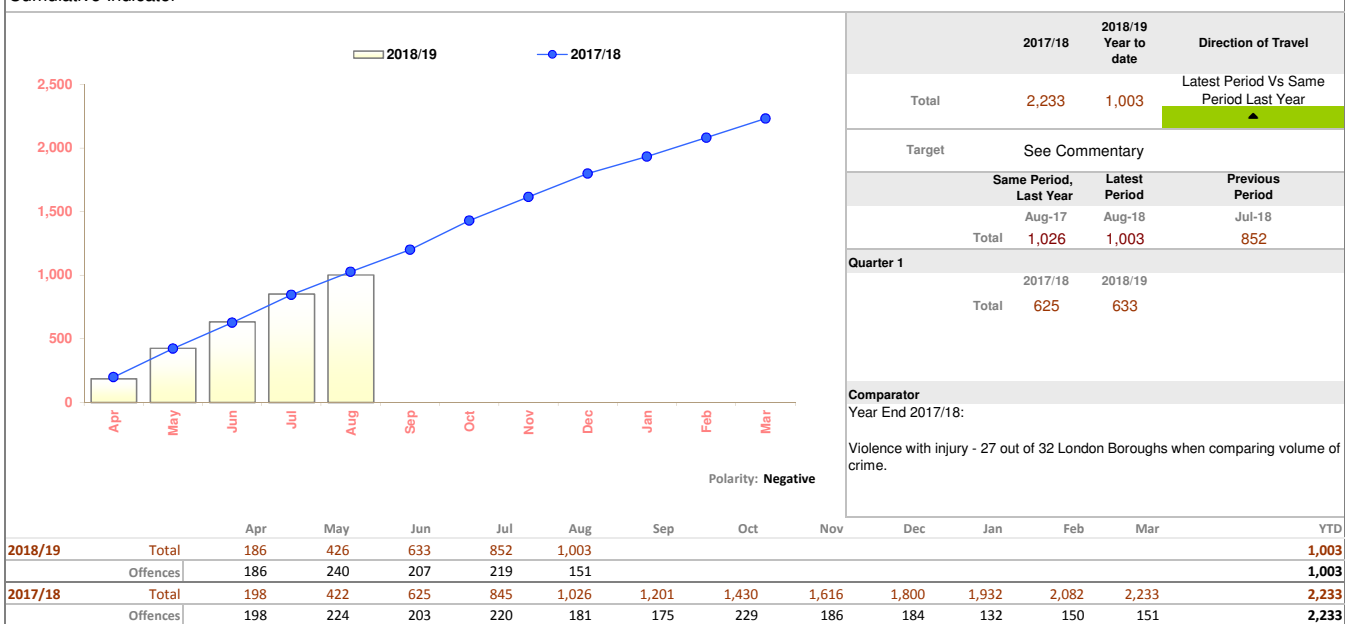
Current performance for the year to date shows that council reported ASB by the general public decrease by -9.0% (-1020 calls) when compared with the same cumulative period last year (10373 vs 11393).

## Definition and Context

All externally received ASB incidents that are reported to the service by the general public, and excludes internally reported ASB by colleagues elsewhere in the Council and ASB investigations initiated by the service (such as those witnessed by CCTV, Law Enforcement Officers etc.) A target is inappropriate for this measure as it is a demand driven measure.

## Non-Domestic Violence with injury offences (Non-Dom VWI)

## Cumulative Indicator



## Comments

## Current Performance

Current performance for the year shows a decrease of -2.2% (-23 offences) when compared with the same cumulative period last year (1003 vs 1026). Monthly performance shows a decrease of -16.6% in violence with injury offences (-30 offences) when compared with the same period last year (151 vs 181).

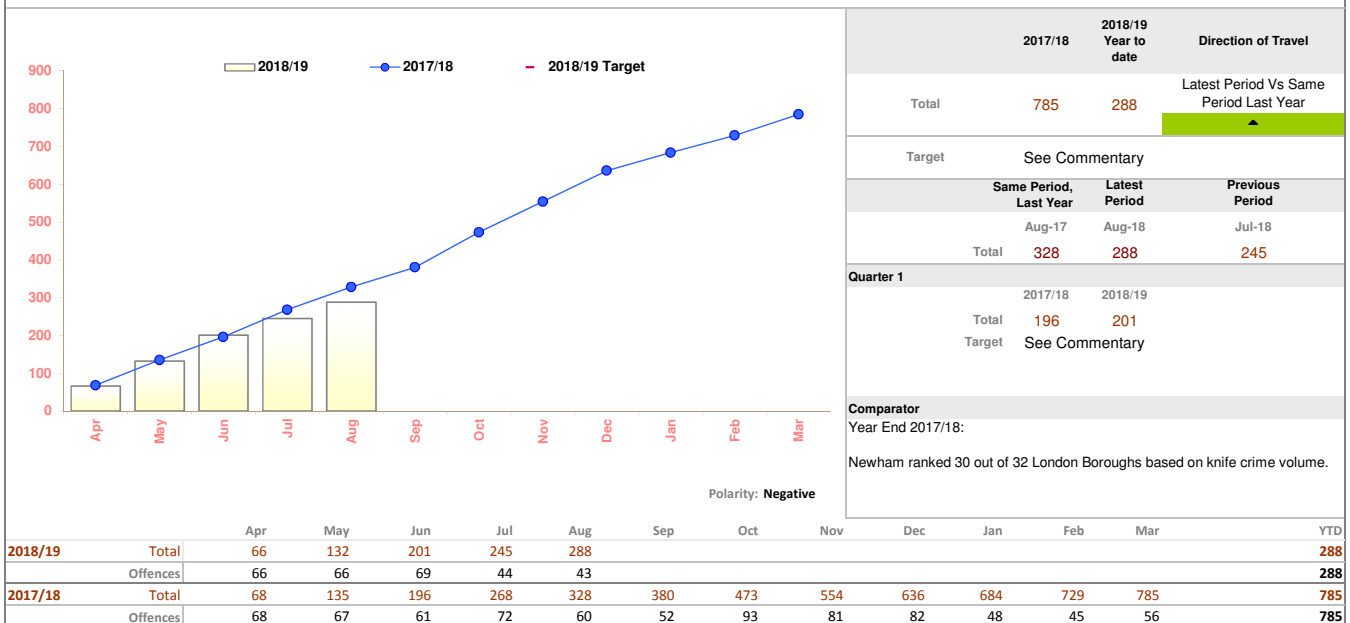
## Definition and Context

There are no targets set by the Mayor's Office for Policing and Crime (MOPAC). Violence with injury offences are a combination of assault with injury offences and most serious violence offences. This crime category screens out the lower profile violent offences such as common assault, harassment and possession of a weapon. This indicator is a refinement of the one that was used in previous years - Serious Violent Crime - and is consistent with the MOPAC seven priorities for Newham Police who have undertaken targeted a number of coordinated operations around Stratford centre, Stratford park and other hotspots to tackle VWI.

Crime statistics are a live data set, and change in real-time as crimes are re-classified. Therefore, each month that data is presented, all months for last year and this year are updated where necessary. This means the current year target will change slightly each month. This explains why there are differences between the latest performance sheet and any previously published sheets - the current month's data (including all historic data on this sheet) are therefore the most up-to-date available.

## Knife crime offences

## Cumulative Indicator



## Comments

## Current Performance

Current performance for the year shows an decrease of -12.2% (-40 offences) when compared with the same cumulative period last year (288 vs 328). Monthly performance shows an decrease of -28.3% in knife crime offences (-17 offences) when compared with the same period last year (43 vs 60).

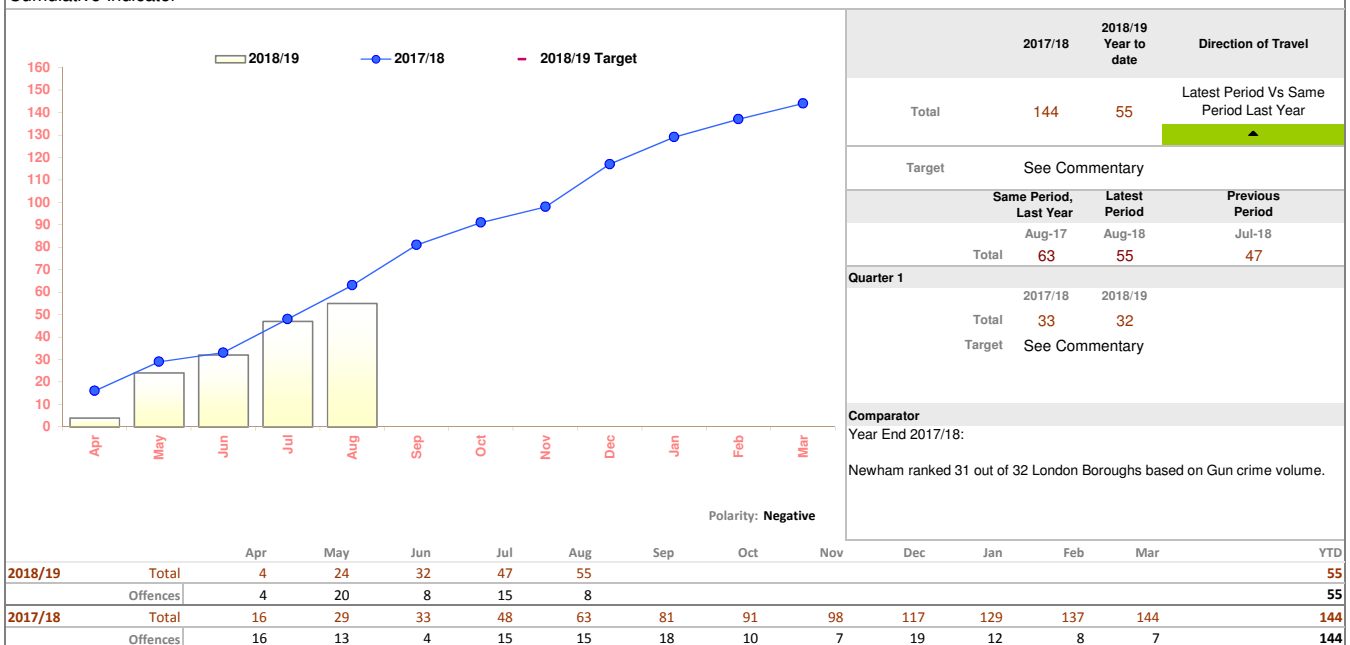
## Definition and Context

A person is guilty of a knife offence if –

- (a) they commit an offence involving bladed instruments such as needles, scissors, broken glass and razor blades.
  - (b) they use another to look after, hide or transport a dangerous weapon for them; and
  - (c) does so under arrangements or in circumstances that facilitate, or are intended to facilitate, the weapon's being available to use for an unlawful purpose.
- There are no targets set by the Mayor's Office for Policing and Crime (MOPAC).

## Gun crime offences.

## Cumulative Indicator



## Comments

## Current Performance

Current performance for the year shows a decrease of -12.7% (-8 offences) when compared with the same cumulative period last year (55 vs 63). Monthly performance shows a decrease of -46.7% in gun crime offences (-7 offences) when compared with the same period last year (8 vs 15).

## Actions and Activity

Tackling gang and gun crime is a major partnership priority, and there are both tactical and strategic gangs forums involving senior police and council officers to ensure a joined up approach. Due to recent changes in the Metropolitan Police reporting processes the breakdown of Gun crime offences (used/seen/intimated) is not currently available.

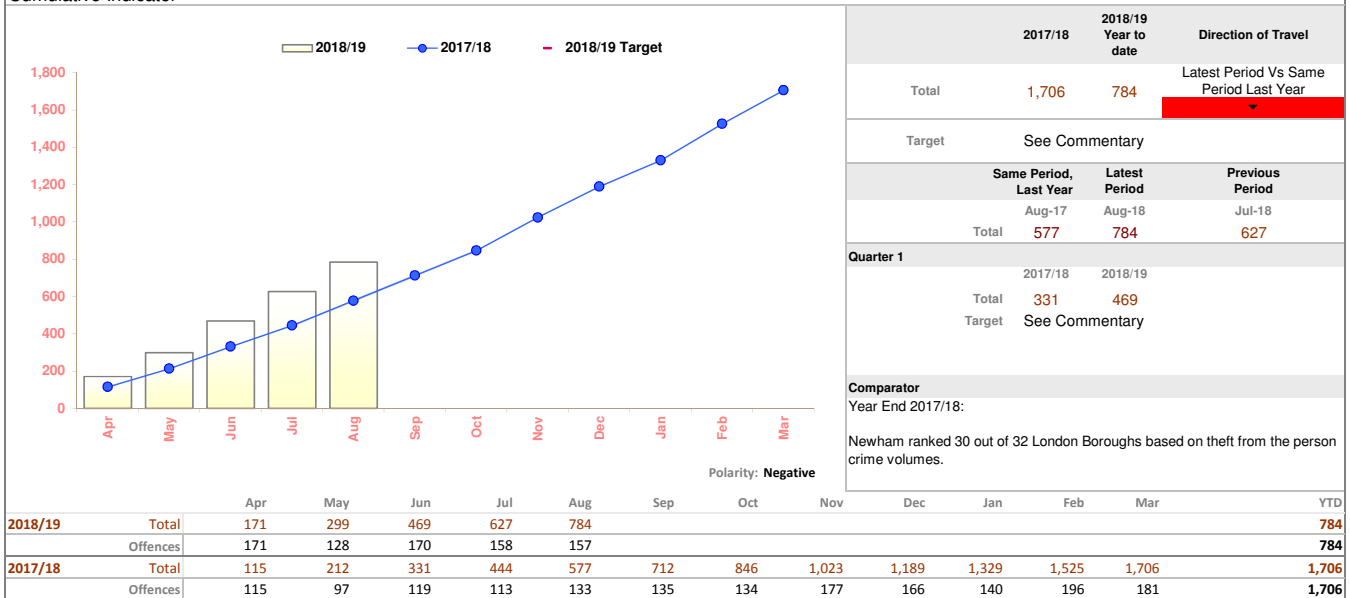
## Definition and Context

Gun crime is crime (violence against the person, robbery, burglary and sexual offences) in which guns are taken to be involved in an offence. A gun is taken to be involved in an offence if it is fired, used as a blunt instrument, or used as a threat. Where the victim is convinced of the presence of a firearm, even if it is concealed, and there is evidence of the suspect's intention to create this impression, then the incident counts. Both real, and fake firearms, and air weapons are counted within this category.

There are no targets set by the Mayor's Office for Policing and Crime (MOPAC).

## Theft from the person offences

## Cumulative Indicator



## Comments

## Current Performance

Current performance for the year shows an increase of 35.9% (207 offences) when compared with the same cumulative period last year (784 vs 577). Monthly performance shows an increase of 18.0% in theft from person offences (24 offences) when compared with the same period last year (157 vs 133).

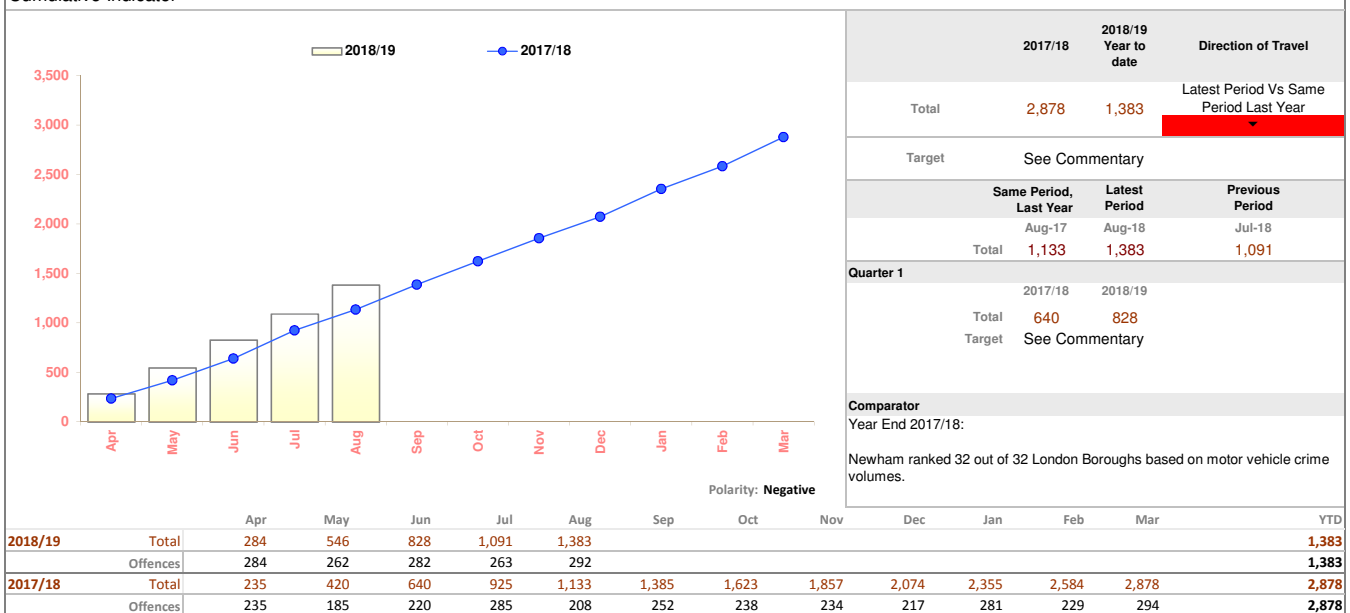
## Definition and Context

"Persons are guilty of theft if they dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it"

Crime statistics are a live data set, and change in real-time as crimes are re-classified. Therefore, each month that data is presented, all months for last year and this year are updated where necessary. This means the current year target will change slightly each month. This explains why there are differences between the latest performance sheet and any previously published sheets - the current month's data (including all historic data on this sheet) are therefore the most up-to-date available. There are no targets set by the Mayor's Office for Policing and Crime (MOPAC).

## Theft from a motor vehicle offences

## Cumulative Indicator



## Comments

## Current Performance

Current performance for the year shows an increase of 22.1% (250 offences) when compared with the same cumulative period last year (1383 vs 1133). Monthly performance shows an increase of 40.4% in theft from a MV offences (84 offences) when compared with the same period last year (292 vs 208).

## Actions and Activity

Police report that the increase is related to mopeds that are of high value and more easily stolen, and which also support other crimes types such as theft snatch (theft from the person).

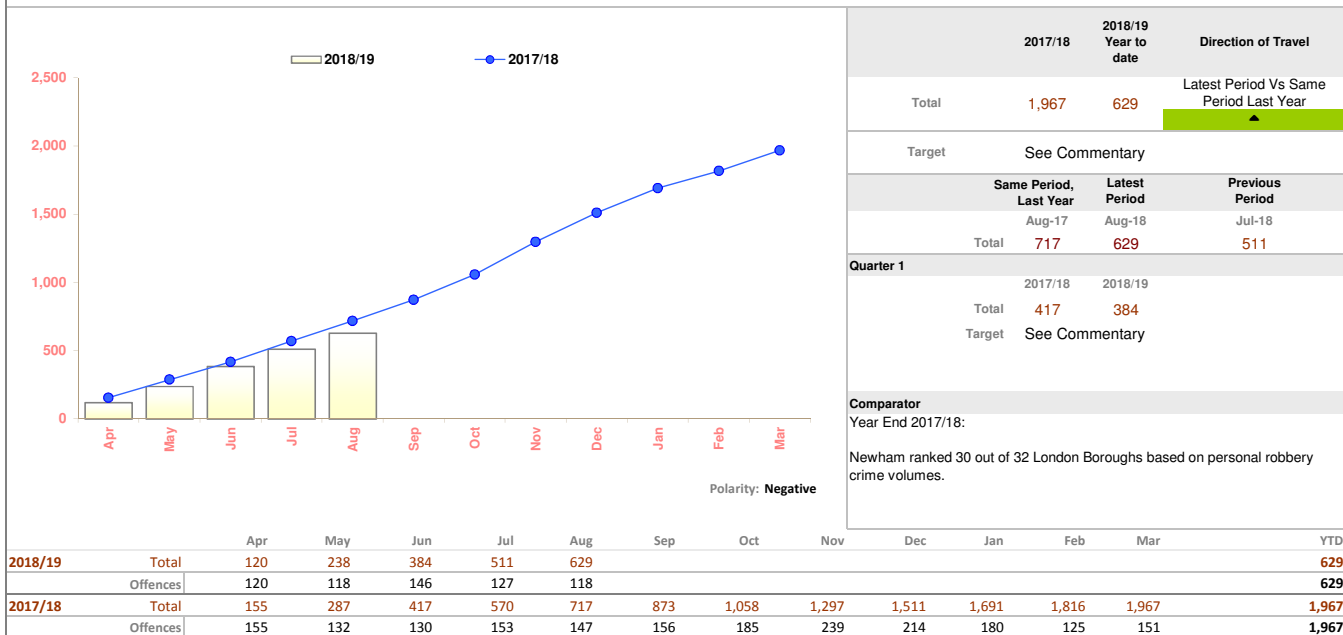
## Definition and Context

"Persons are guilty of theft if they dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it"

Crime statistics are a live data set, and change in real-time as crimes are re-classified. Therefore, each month that data is presented, all months for last year and this year are updated where necessary. This means the current year target will change slightly each month. This explains why there are differences between the latest performance sheet and any previously published sheets - the current month's data (including all historic data on this sheet) are therefore the most up-to-date available. There are no targets set by the Mayor's Office for Policing and Crime (MOPAC).

## Personal Robbery offences

## Cumulative Indicator



## Comments

## Current Performance

Current performance for the year shows an decrease of -12.3% (-88 offences) when compared with the same cumulative period last year (629 vs 717). Monthly performance shows an decrease of -19.7% in personal robbery offences (-29 offences) when compared with the same period last year (118 vs 147).

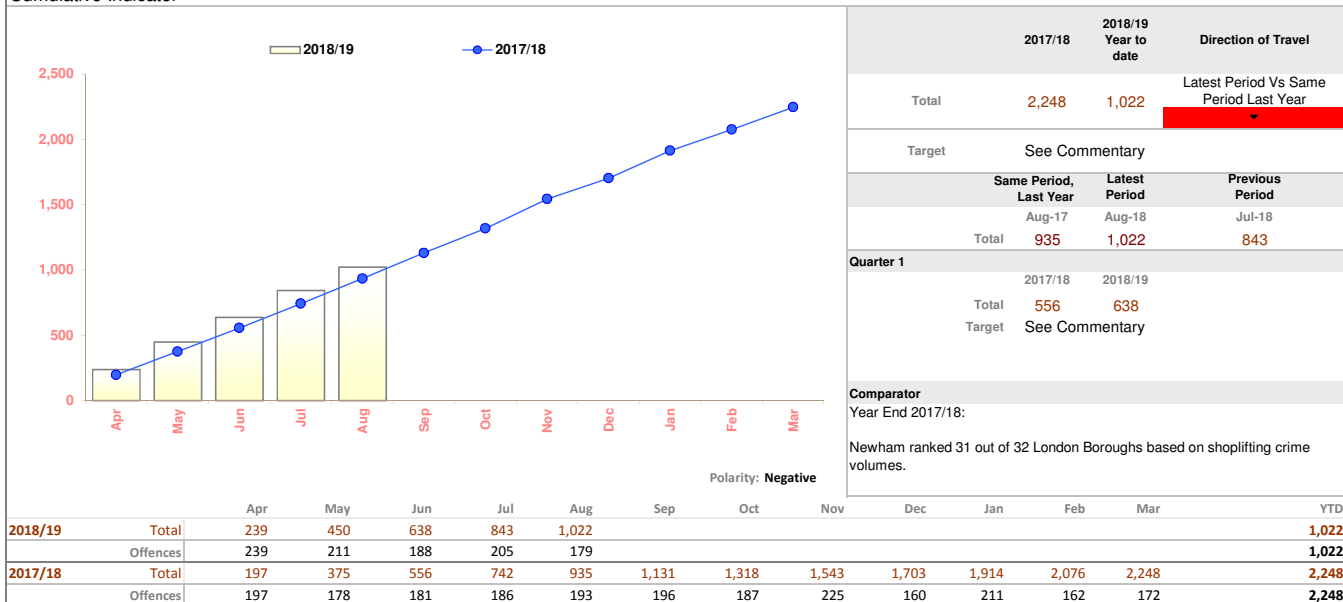
## Definition and Context

"A person is guilty of robbery if they steal, and immediately before or at the time of doing so, and in order to do so, uses force on any person or puts or seeks to put any person in fear of being then and there subjected to force."

Crime statistics are a live data set, and change in real-time as crimes are re-classified. Therefore, each month that data is presented, all months for last year and this year are updated where necessary. This means the current year target will change slightly each month. This explains why there are differences between the latest performance sheet and any previously published sheets - the current month's data (including all historic data on this sheet) are therefore the most up-to-date available. There are no targets set by the Mayor's Office for Policing and Crime (MOPAC).

## Shoplifting offences

## Cumulative Indicator



## Comments

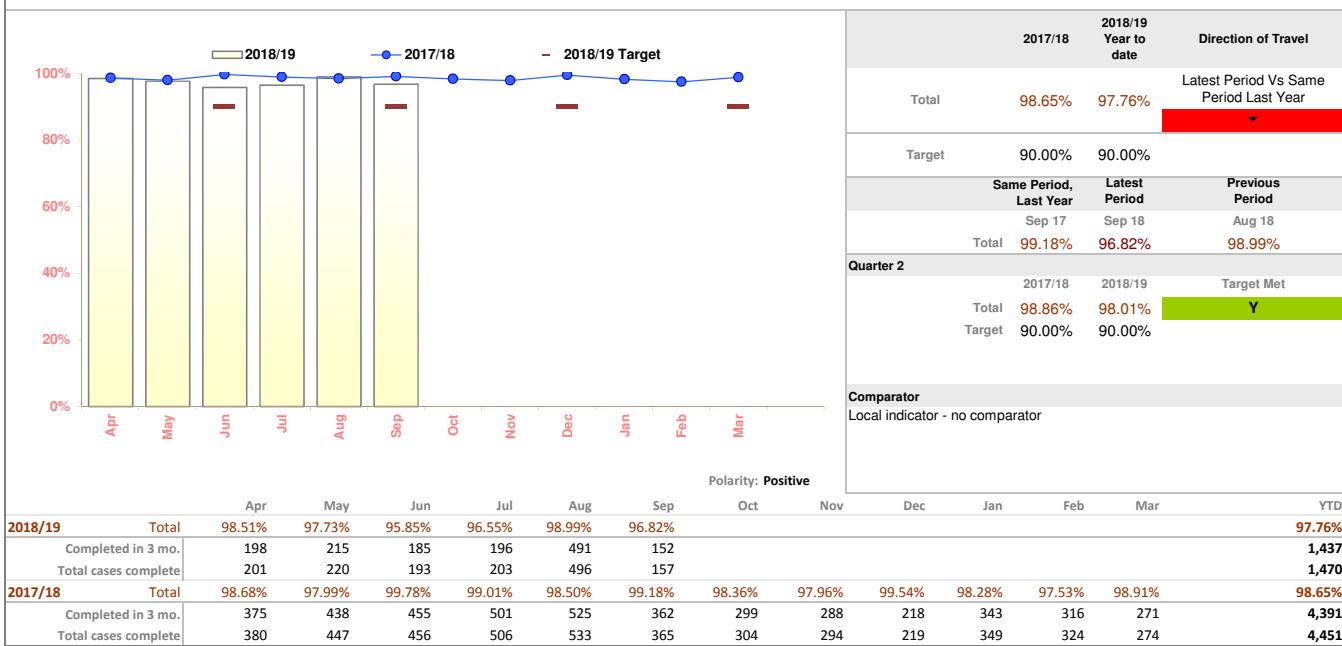
## Current Performance

Current performance for the year shows an increase of 9.3% (87 offences) when compared with the same cumulative period last year (1022 vs 935). Monthly performance shows an decrease of -7.3% in shoplifting offences (-14 offences) when compared with the same period last year (179 vs 193).

## Definition and Context

"A person is guilty of theft if they dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it". The terms in this basic definition are amplified in Sections 2-6 of the Theft Act. Theft of any property within a shop, whether or not it is for sale, should be recorded as theft from a shop. There are no targets set by the Mayor's Office for Policing and Crime (MOPAC).

## Percentage of noise cases completed within 3 months



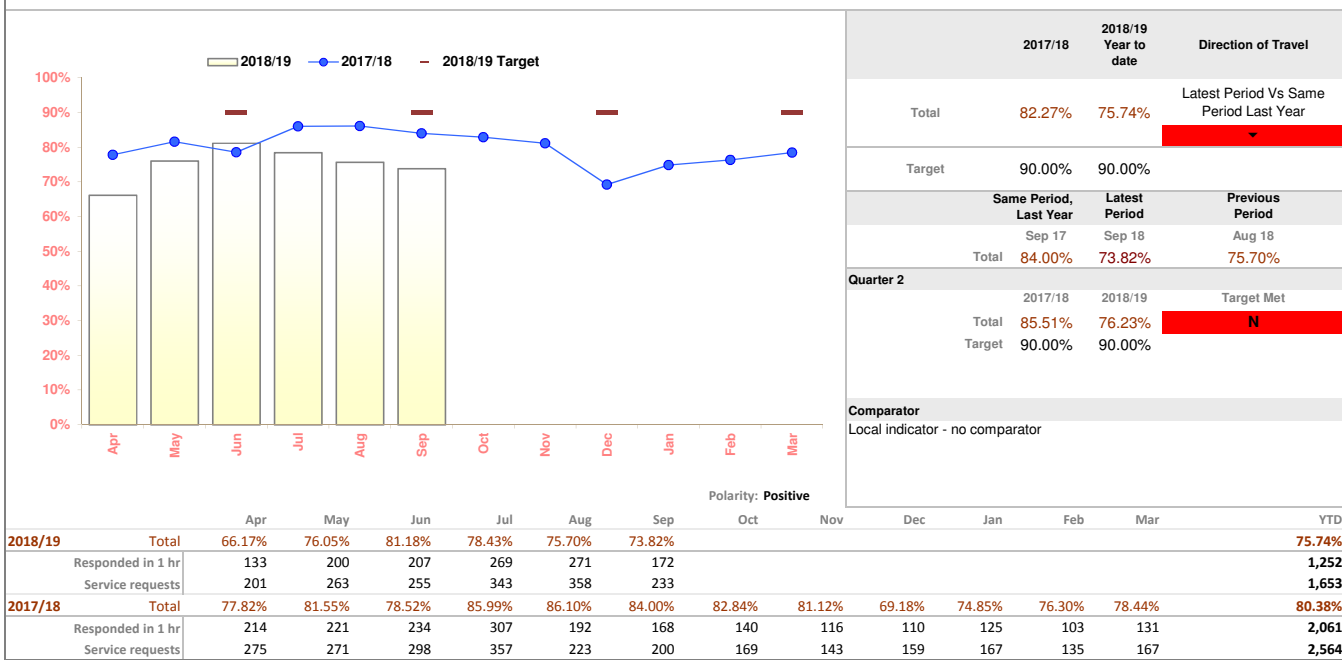
## Current Performance

Currently performance for the year shows that 97.76% (1437/1470) of noise records were closed as completed, this compared with 98.85% (2656/2687) for the same period last year.

## Definition and Context

This indicator measures the Council's ability to resolve noise investigations in a timely manner. It considers all service requests that have been closed in the month and concludes whether they were closed within the target time of three months.

## Percentage of urgent noise reports that are received during operational hours and responded to within one hour.



## Current Performance

Currently performance for the year shows that 75.74% (1252 / 1653) of noise complaints were responded to within 1 hour, compared with 82.27% (1336 / 1624) for the same period last year.

## Actions and Activity

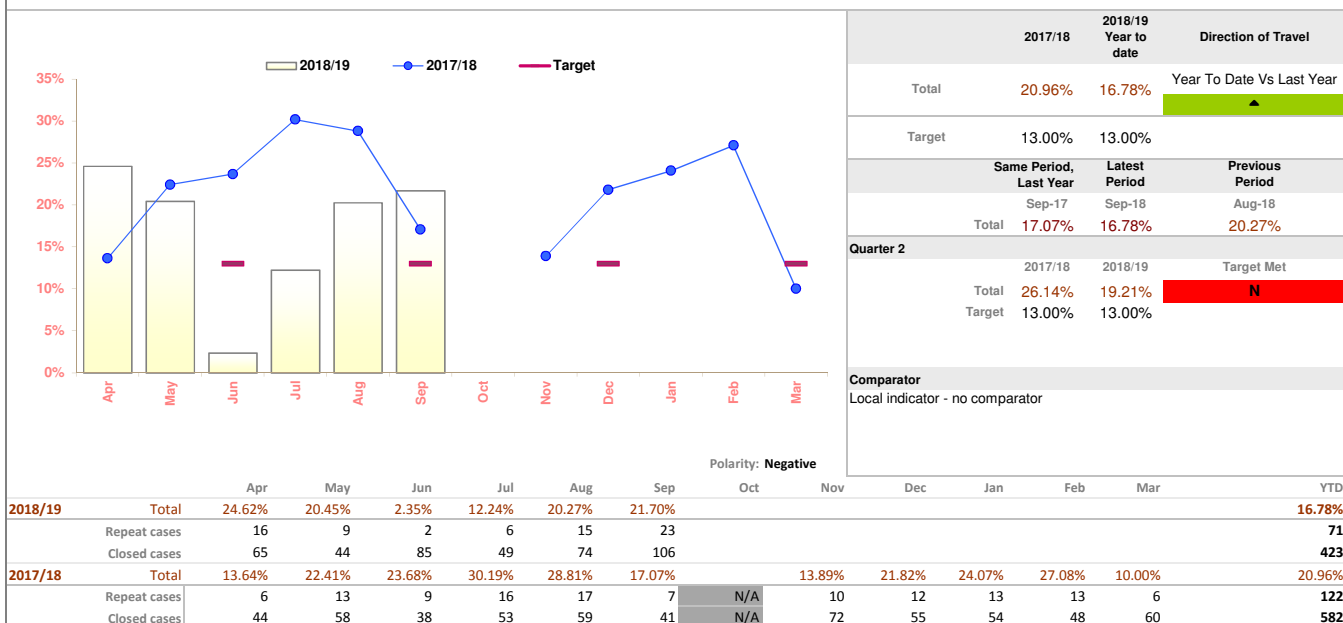
The 90% urgent noise target has not been met due to vacancies within the responsible team, we are currently undertaking recruitment to deal with this issue.

## Definition and Context

This indicator measures the speed of the council's response to urgent noise calls. An urgent call is one where the noise was happening at the time of the complaint, and therefore requiring an immediate response in order to gather evidence where appropriate. Callers who wish to remain anonymous are not counted in the measure. Note that performance is measured from data during "operational" periods only (e.g. no service Monday and Tuesday evenings/night). The target is to achieve an initial response of 90% in 60 minutes.



Percentage of DSV (Domestic & Sexual Violence) victims who were repeat victims after accessing the Independent Domestic & Sexual Violence Advocacy Service (IDSVA) and case has been closed (total cases).



#### Comments

16.78% of victims of domestic and sexual violence who had accessed the Independent Domestic and Sexual Violence Advocacy service were repeat victims.

The Core Funded Independent Domestic & Sexual Violence Advocacy Service (IDSVA) continues to provide advice and casework advocacy to the most high-risk victims of DSV primarily using the successful One Stop Shop service delivery model (contractor Aanchal).

Definition; Percentage of Domestic & Sexual Violence victims who were repeat victims after accessing Domestic Violence Services and where the number of cases within the service(s) have been closed (total monthly cases - nia & Aanchal combined).

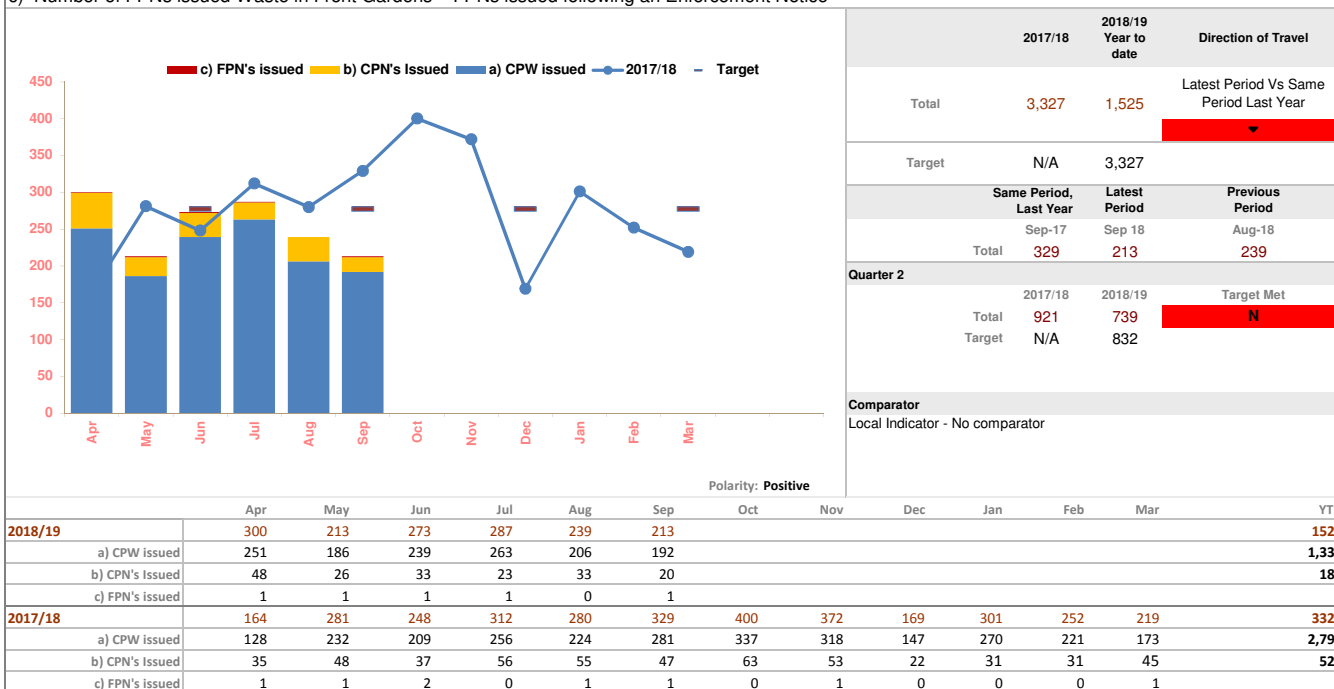
In general data, for this measure is sometimes only available on or after the 16th of each month to allow the domestic violence service to undertake data quality checks, and therefore reported a month in arrears. October 2017 data was not received. A contract monitoring review takes place every quarter to ensure that all casework data is accurately collected and recorded, and in these circumstances there may be occurrences where data is subject to change as a result of retrospective updating.

## Waste in Front Gardens - Notices Issued (CPW/CPN/FPN)

a) Number of CPW Issued: Upon discovery of accumulative waste, on open land and in a front or rear garden which could include but not limited to mattresses, furniture, building waste, and other refuse/litter, a Community Protection Warning (CPW) is issued.

b) Number of CPN's Issued: Waste in Front Gardens - Enforcement Notices served

c) Number of FPNs issued Waste in Front Gardens – FPNs issued following an Enforcement Notice



## Comments

## Current Performance

Current performance for the year shows a -5.5% reduction (x89) in waste in front gardens enforcement warnings and notices issued when compared with the same period last year (1525 vs 1614). Current monthly performance shows a 14.5% reduction in total enforcement notices issued (-116) when compared with the same period last year (213 vs 329).

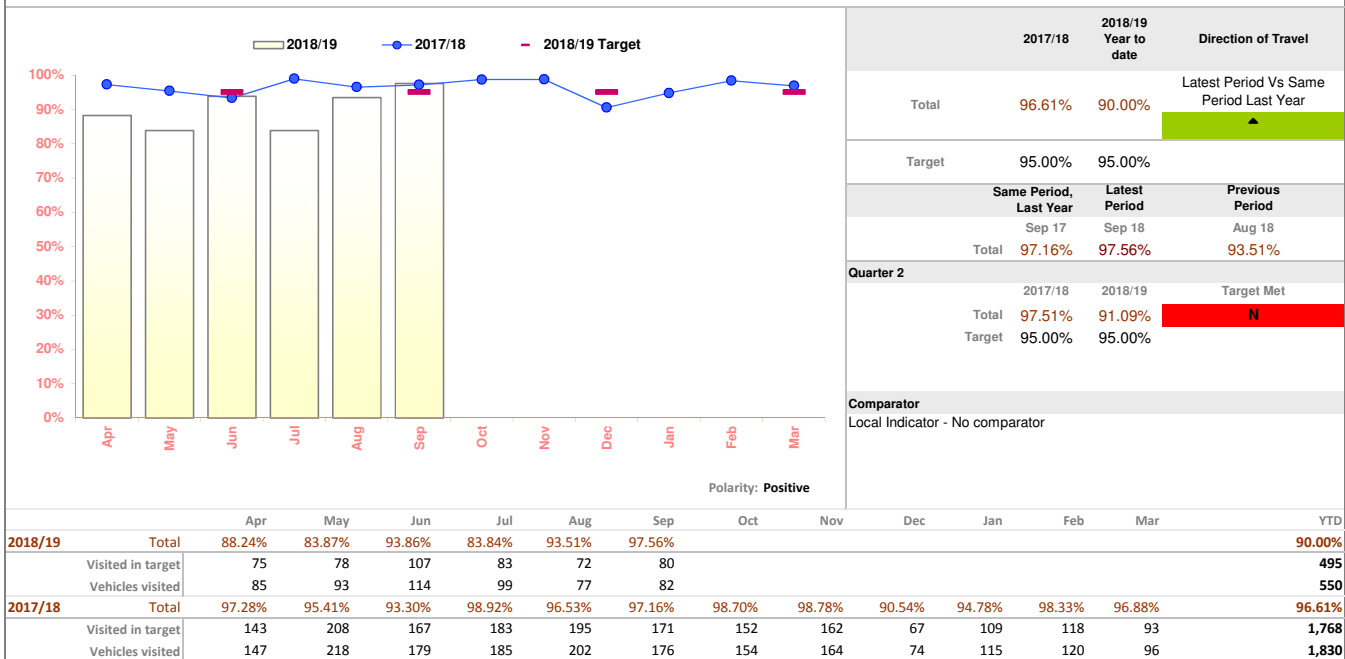
## Actions and Activity

Although the numbers of CPWs and CPNs are below the level seen last year this should be seen as a positive indicator that compliance is being achieved, this is also reflected in the low number of FPNs being issued after CPWs and CPNs. The service believes that a focused approach to neighbourhood enforcement has led to clearer guidance and better community relationships, resulting in greater compliance. In addition a CPW issued remains in force for the time a person resides at a property, and will only be re-issued if there is a change of ownership/residential status.

## Definition and Context

Upon discovery of accumulative waste, on open land and in a front or rear garden which could include but not limited to mattresses, furniture, building waste, and other refuse/litter, a Community Protection Warning (CPW) is issued. If this notice is not complied with a Community Protection Notice (CPN) is issued. If this CPN is not complied with Fixed Penalty Notice (FPN) will be issued.

## Percentage of Abandoned Vehicles inspected within 24 hours of being reported



## Comments

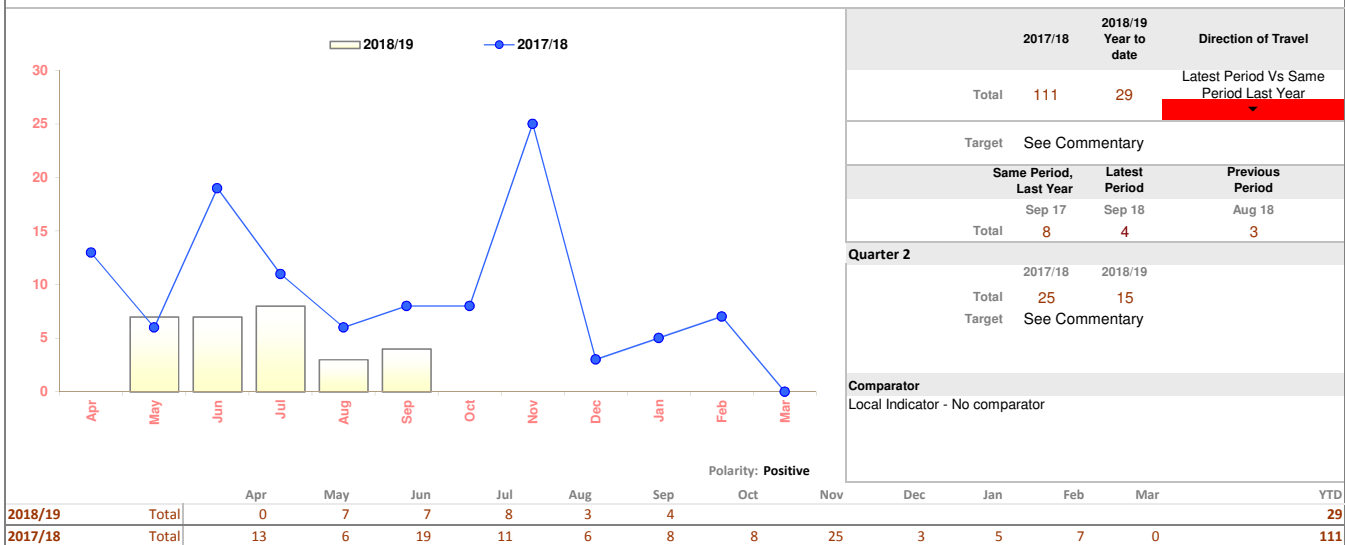
Current performance for the year shows that 90.0% (495 / 550) of abandoned vehicles have been inspected within the target period (24 hours), this compared with 96.4% (1067 / 1107) for the same period last year. Current monthly performance shows that 97.6% (80 / 82) of abandoned vehicles were visited within 24 hours of being reported, this compared with 97.2% (171 / 176) for the same period last year. The number of abandoned vehicles visited shows a decrease of -50.3% when 2018/19 is compared with 2017/18, (550 vs 1107).

## Definition and Context

The number of vehicles that have been reported as abandoned by a member of the public or by a law enforcement officer and meets the written criteria relating to an abandoned vehicle upon visitation."

## CFS021.1

## Number of arrests attributable to CCTV



## Comments

## Current Performance

Current performance for the year shows that there have been 29 arrests attributable to CCTV surveillance. This compared with 63 for the same period last year, a decrease of -54.0% (-34 arrests). Current monthly performance shows that 4 arrests were made as a result of CCTV surveillance, compared with 8 for the same period last year (4 vs 8). Currently, arrests are as a result of retrospective CCTV review by metropolitan police officers.

There have also been 870 CCTV evidence download requests from Police or partners this YTD.

## Actions and Activity

CCTV operations can be a result of direct surveillance, as a result of a tasking or operational initiative or as a result of general monitoring.

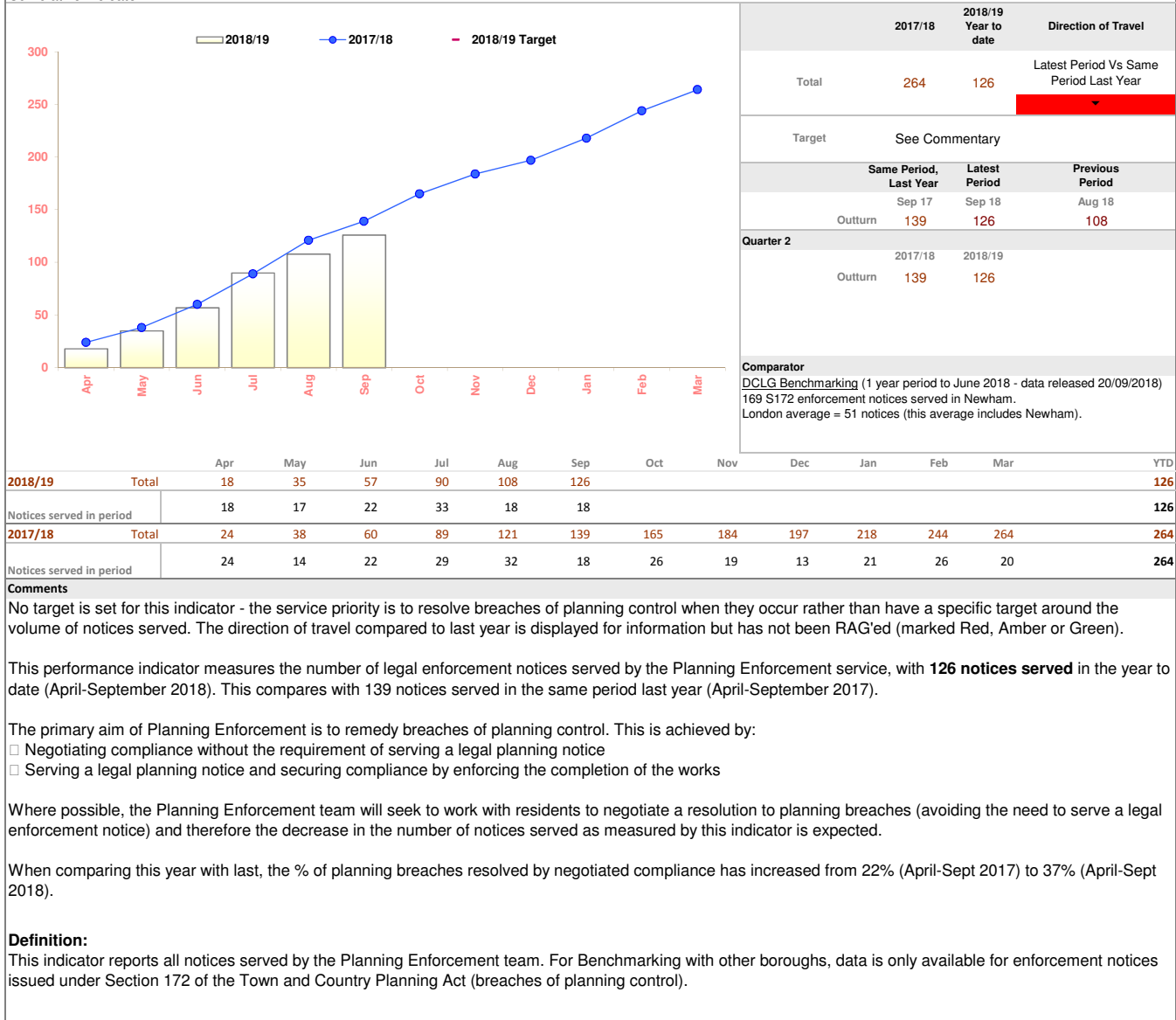
## Definition and Context

This indicator measures both reactive and proactive arrests linked to CCTV operations. The latter refers to the cameras being tasked as part of particular initiatives or particular premises, whereas the former is through the routine monitoring of camera images. Please note that cctv is mostly intelligence led so spikes can occur. The Police will assess whether requests for imagery from our CCTV cameras is required as part of their broader investigation and may not always lead to an arrest.

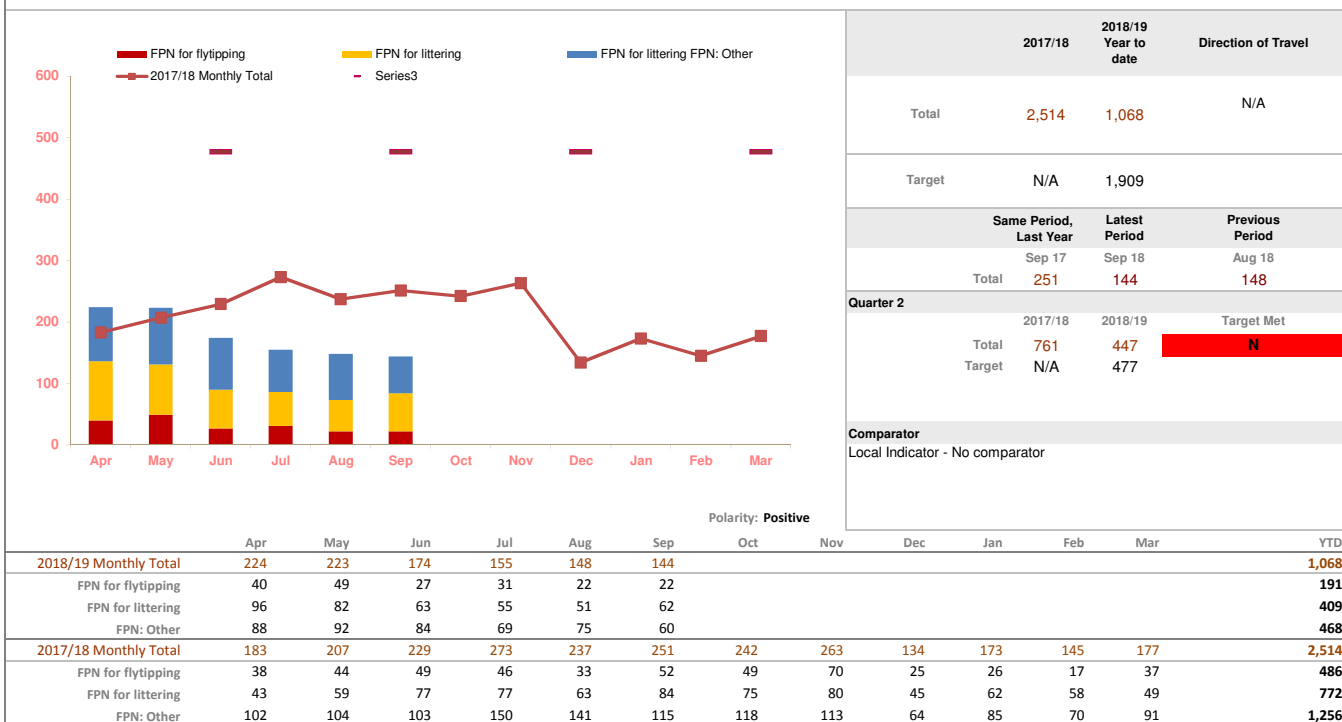


## Planning enforcement notices served

## Cumulative Indicator



## Total number of Fixed Penalty Notices issued for Flytipping, Littering and Other.



## Comments

**Current Performance**

Current performance for the year to date shows that 1,068 FPN have been issued, this compared with 1,380 for the same cumulative period last year. Monthly performance shows that 22 Fly tipping FPNs had been issued, 62 for Littering, and 60 for all other FPNs.

**Actions and Activity**

The division is on target to reach a target of 1,909 FPNs by the end of the year. They have achieved the number so far with a significant shortfall of officers for the majority of the year. They have just appointed 11 new LEO's who are currently undergoing training so I would expect us to surpass the target. They have also prosecuted a total of 106 cases, of which 16 are for Flytipping, 51 for Blue Badge Misuse, the rest being a diverse mix of everything from Skips to Abandoned Vehicles. A total of 20 Vehicles have been seized in respect of Flytipping Offences.

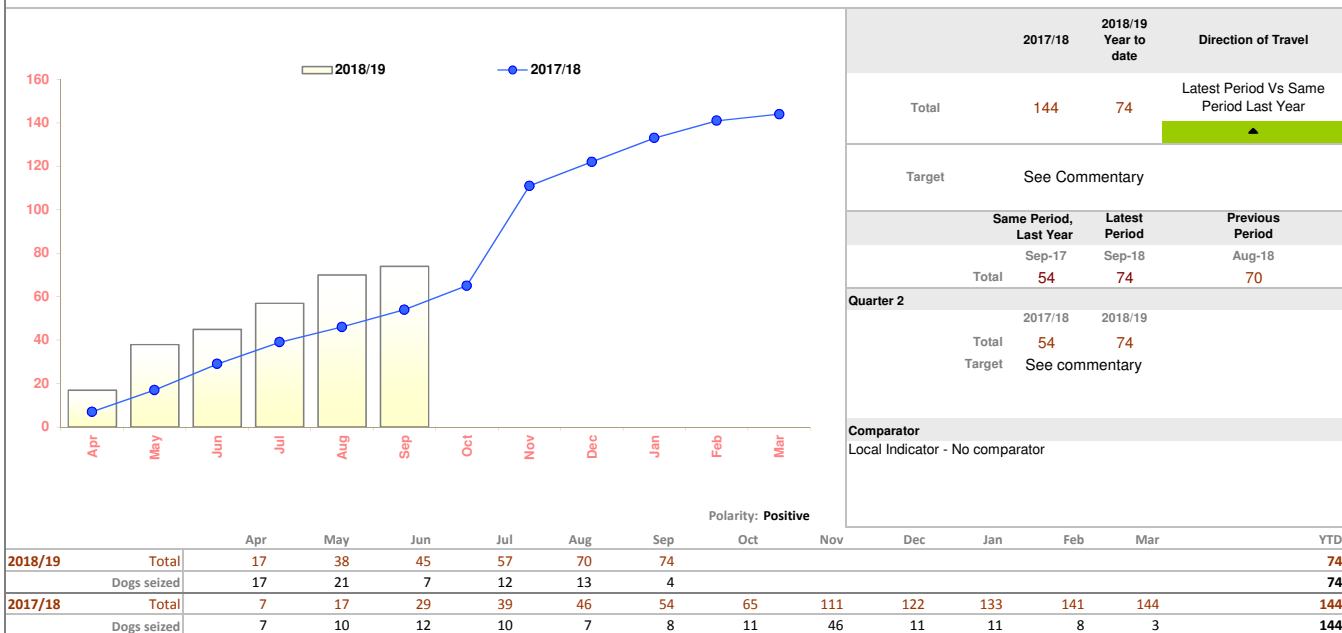
Despite Enforcement and Safety being 25% understrength we have achieved from FPN's an income of £333,050, (17/18). This year taking into account our resource deficit despite our resource we have achieved income from FPN's £134,040 . We are likely to surpass last year's income generation also.

**Definition and Context**

This indicator measures the number of Fixed Penalty Notices issued by a Law Enforcement Officer (LEO) to a member of the public as a result of an action that is covered by governmental legislation.

## Number of seized dogs by LBN Animal Welfare

## Cumulative indicator



## Comments

## Current Performance

Current performance for the year shows that 74 dangerous dogs have been seized to date, compared with 54 for the same period last year. There is no target set as this is a demand led service.

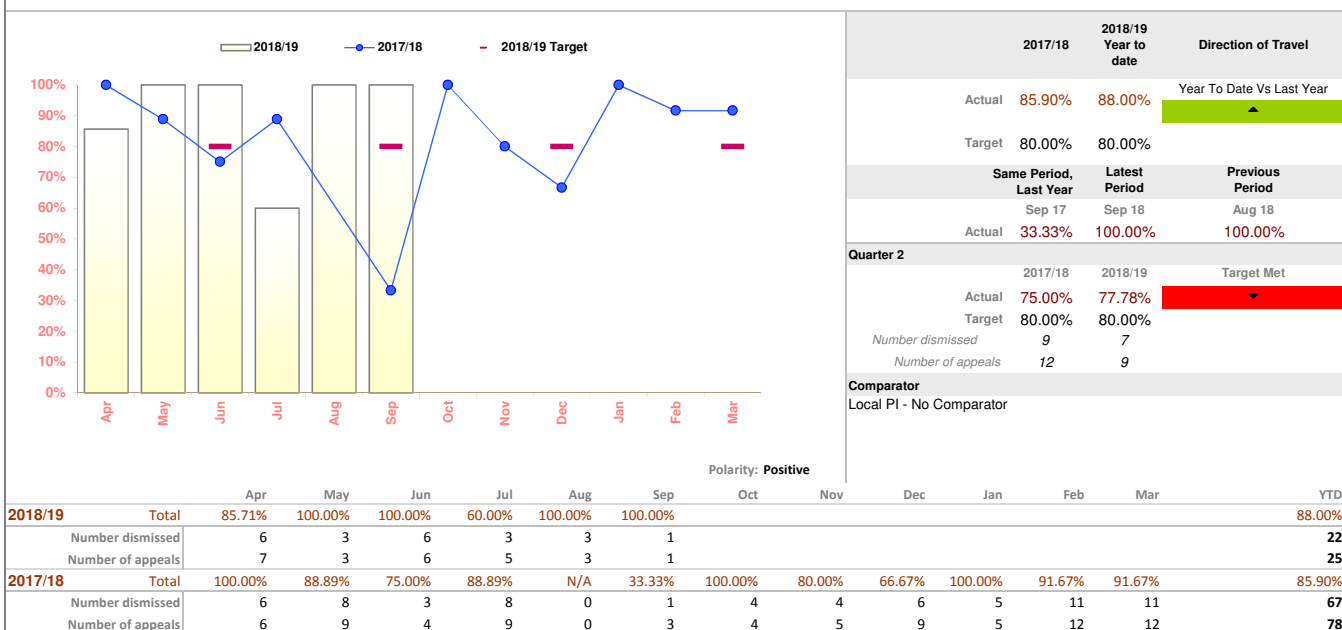
## Definition and Context

This indicator reflect the total number of dogs seized by LBN Animal Welfare. This includes dangerous dogs, aggressive dogs, dogs that may pose a threat to public safety , for examples, stray dogs on the public highway or on school property, dogs that are loose in the public domain and dogs that are subject to cruel treatment by their keepers.

Please Note: (Nov 2017) - 20 dogs and 3 litters of puppies (18 puppies) seized jointly with the police with a warrant. The police took the lead action which was being supported by LBN.

## L40 (Service PI)

## % of planning enforcement appeals dismissed (including those dismissed with variation)



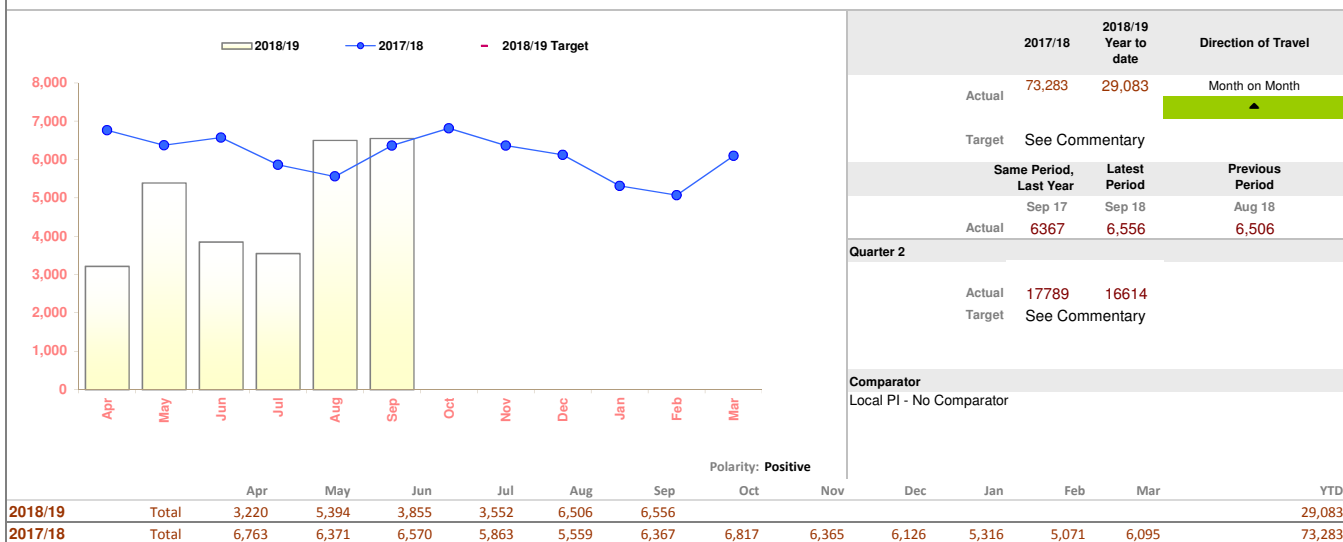
## Comments

88% of planning enforcement appeals determined in the year to date have been dismissed (found in favour of the Council). This is above the 80% target level. The overall number of appeals in the year to date (25) is lower than in the same period last year (31 appeals were determined in the period April-September 2017).

Low numbers of planning enforcement appeals and the success rate for LBN for those cases reaching appeal continues to provide confirmation of the quality of planning enforcement decisions.



## Parking Service - Moving traffic violations.



## Comments

## Current Performance

Current performance for the year shows that there have been 29,083 moving traffic violations to date, of which in the last reported month 22.5% (1,476) were for 'entering or stopping in a yellow box junction when prohibited'.

## Definition and Context

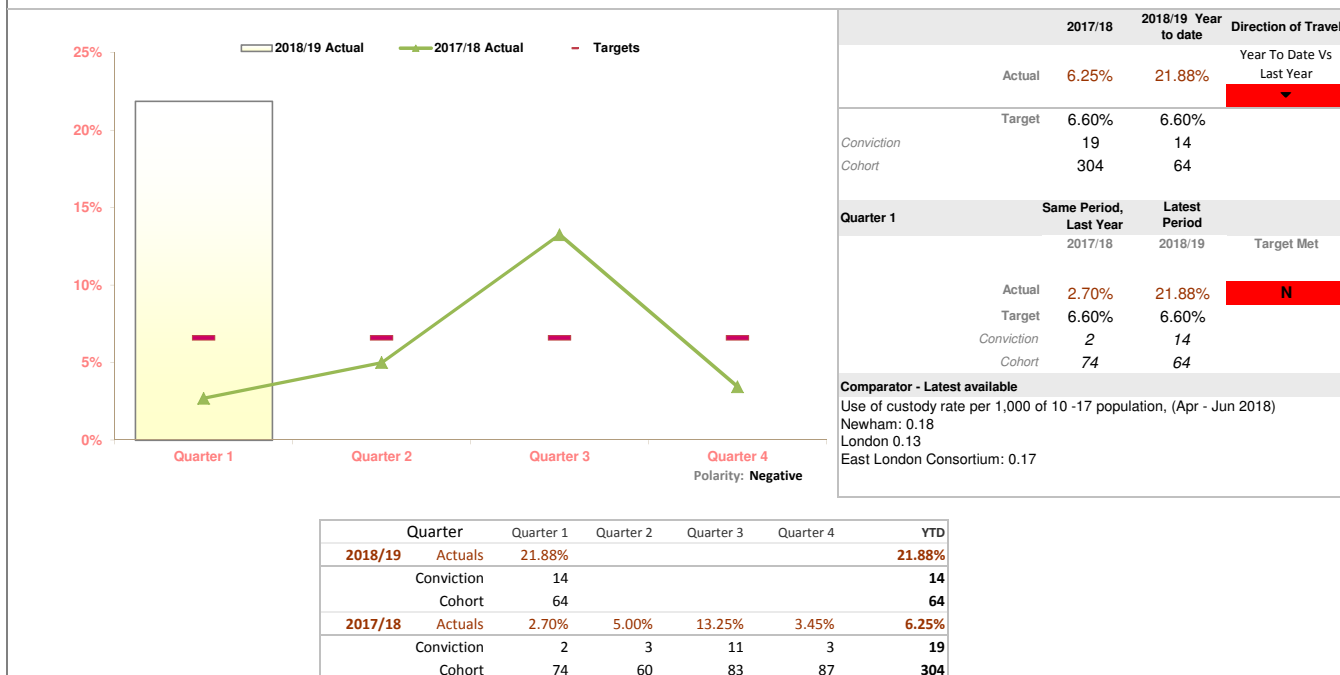
The Deregulation Act which came into effect in 2015 prohibited the enforcement of certain offences via CCTV, namely; Yellow Lines, Double yellow lines, double parking, footway parking, etc). As a result the only offences that can be enforced are moving traffic and bus lane violations (detailed list is shown below).

From 1 April 2015, local authorities can only enforce parking restrictions by camera in the following instances:

- school keep clear markings
- bus stop/stand clearways
- red routes
- bus lanes
- Moving traffic contraventions

CCTV can still be used to guide on foot and mobile officers to offences as required.

Young people within the Youth Justice System receiving a conviction in court who are sentenced to custody  
(Reported one quarter in arrears)



#### Comments

##### Current Performance

In Quarter 1, 21.88% (14/64) of young people who were convicted in court were sentenced to custody. The latest comparator data from the YJB is for the period Apr - Jun 2018. This shows that Newham has a higher rate of custody than London and higher rate to that of the East London Consortium.

##### Actions and Activity

All remands are discussed in the YOT's weekly Court Review Panel in order that bail applications can be reviewed and referrals to other agencies (such as CAMHS and Children's Services) can be explored.

Our Bail packages, including Bail ISS, have been reviewed and strengthened. New guidance and revised templates have been disseminated to case managers.

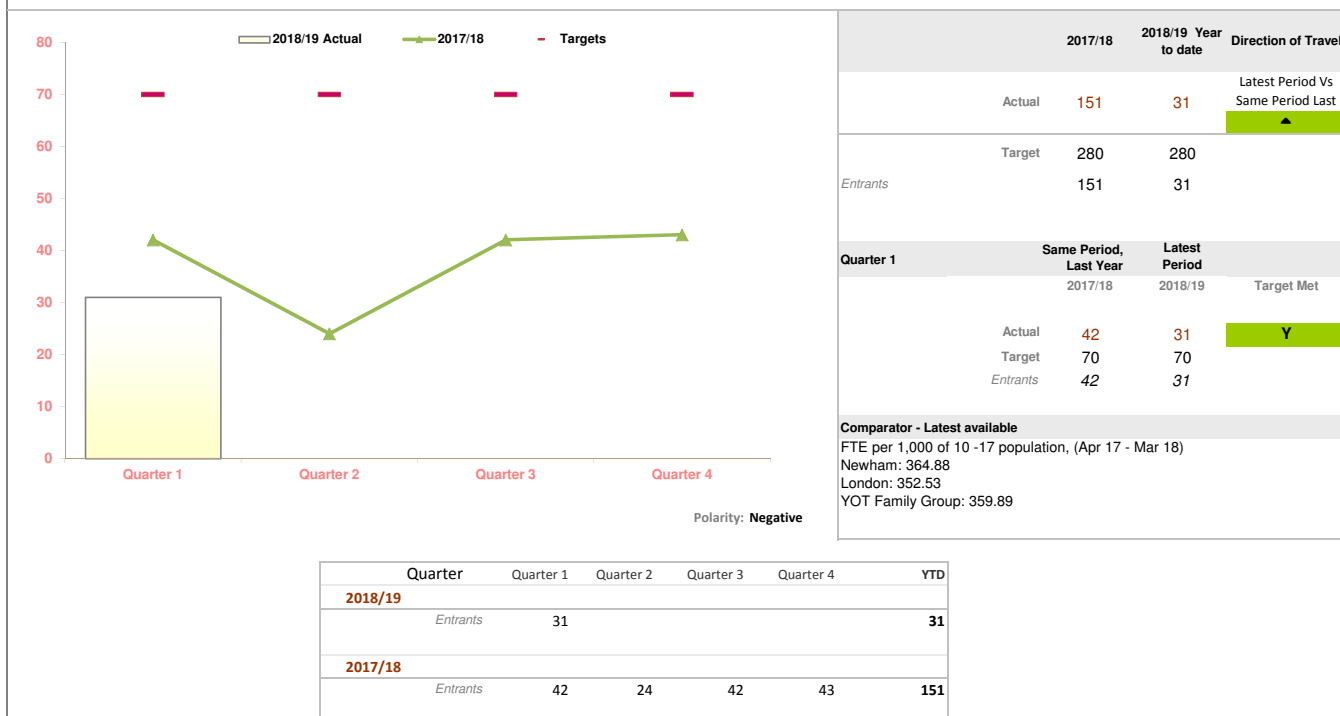
The YOT continues to monitor remands, utilising a Youth Justice Board toolkit. A swift response is required when a young person is produced as an overnight prisoner in Court. Our Duty Manager and Duty workers work closely in liaison with YOT staff in Court to provide robust bail support packages that address identified risks and prevent unnecessary remands.

Our drive to reduce custody is made more pertinent in light of negative inspections of YOIs; in particular of Cookham Wood YOI which is our catchment establishment. Case managers are tasked to liaise closely with the prison Social work leads to ensure safeguarding remains a focal part of young people's time in custody.

##### Definiton and Context

This YJB figure is the number of custodial sentences given to young people in court presented as a rate per 1,000 young people in local population. Note In some cases Newham Council might argue for custody as a matter of public protection.

# First time entrants (FTE) to Youth Justice System



## Comments

### Current Performance

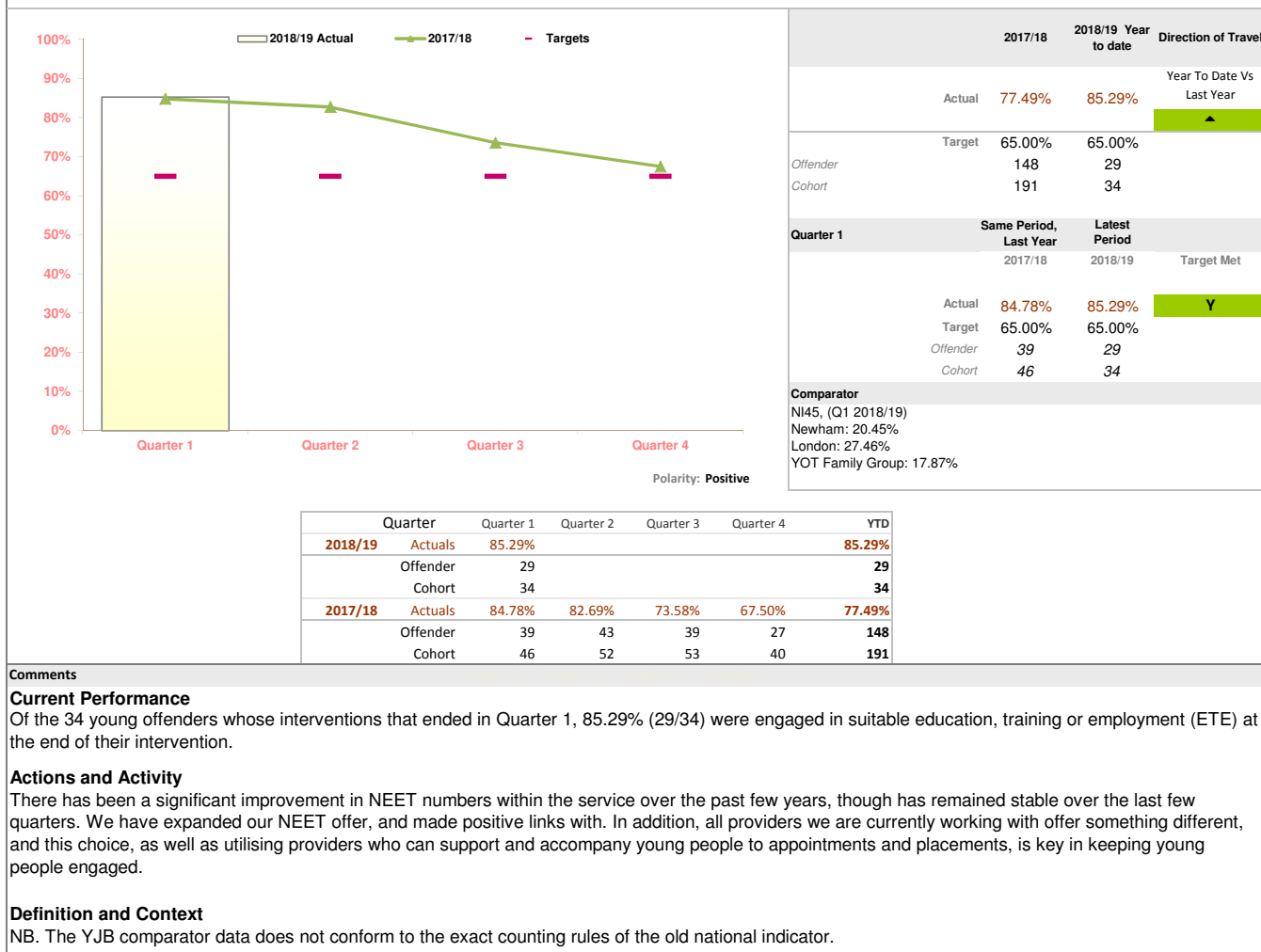
In Quarter 2, there were 31 first time entrants to the Youth Justice System in Newham.

### Definiton and Context

Robbery, theft, offensive weapons and drugs offences make up the majority of offence type for FTEs in Newham. These often act as trigger offences for young people going on to commit more offences including those of a more serious nature.

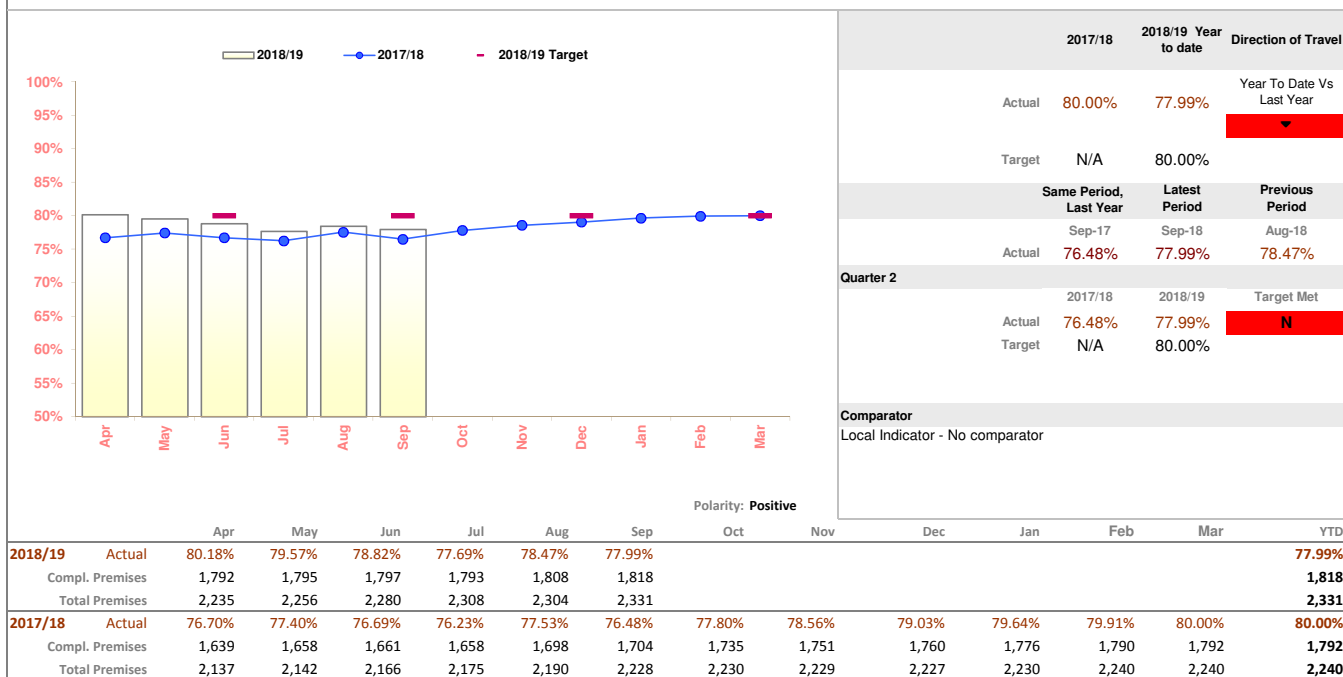
The YOT currently operates a triage system of diversion from the criminal justice system. This allows police and YOT to make joint decisions on disposal options and if appropriate divert young people away from the formal youth justice system and carry out an intervention with them to prevent further offending. Young people who have been identified as of concern by professionals particularly those that are at risk of gang association can be referred to YOT for engagement in work to address risk of entering into offending behaviour. NB: The YJB comparator data is based on Police data, whereas the indicator is based upon YOT data.

# Young Offenders engagement in suitable education, training and employment



## Percentage of food establishments which are broadly compliant with food hygiene law - including new and unrated premises

(snapshot indicator)



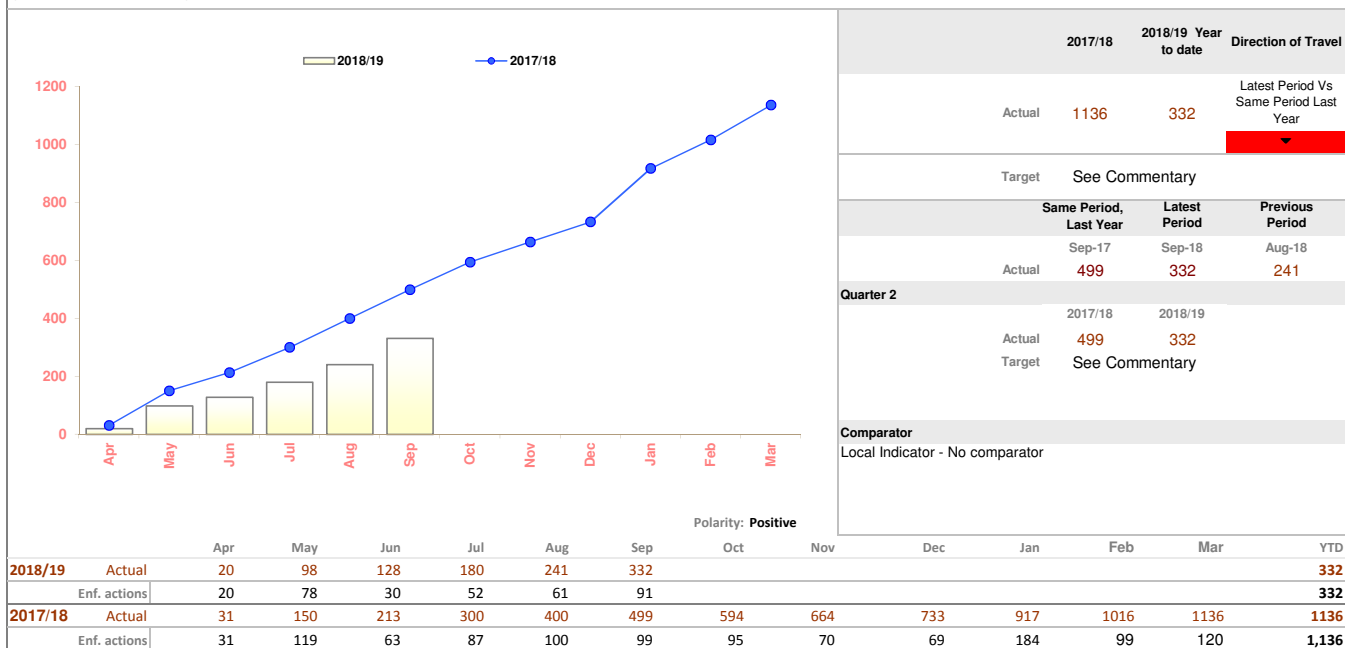
## Comments

## Current Performance

Current performance snapshot for the year shows that 77.99% (1,818 / 2,331) of premises which had been inspected in Newham have been found to be broadly compliant with food hygiene law. This compared with 76.48% (1,704 / 2,228) for the same period last year. It should be noted that the total number of inspections of food premises has increased by 103 inspections. Newham continues to have a high churn of food business (up to 30% per year) with the impact that all businesses with a new owner are automatically classed as being non-compliant until they have been inspected and rated.

## Food safety enforcement actions

(cumulative indicator)



## Comments

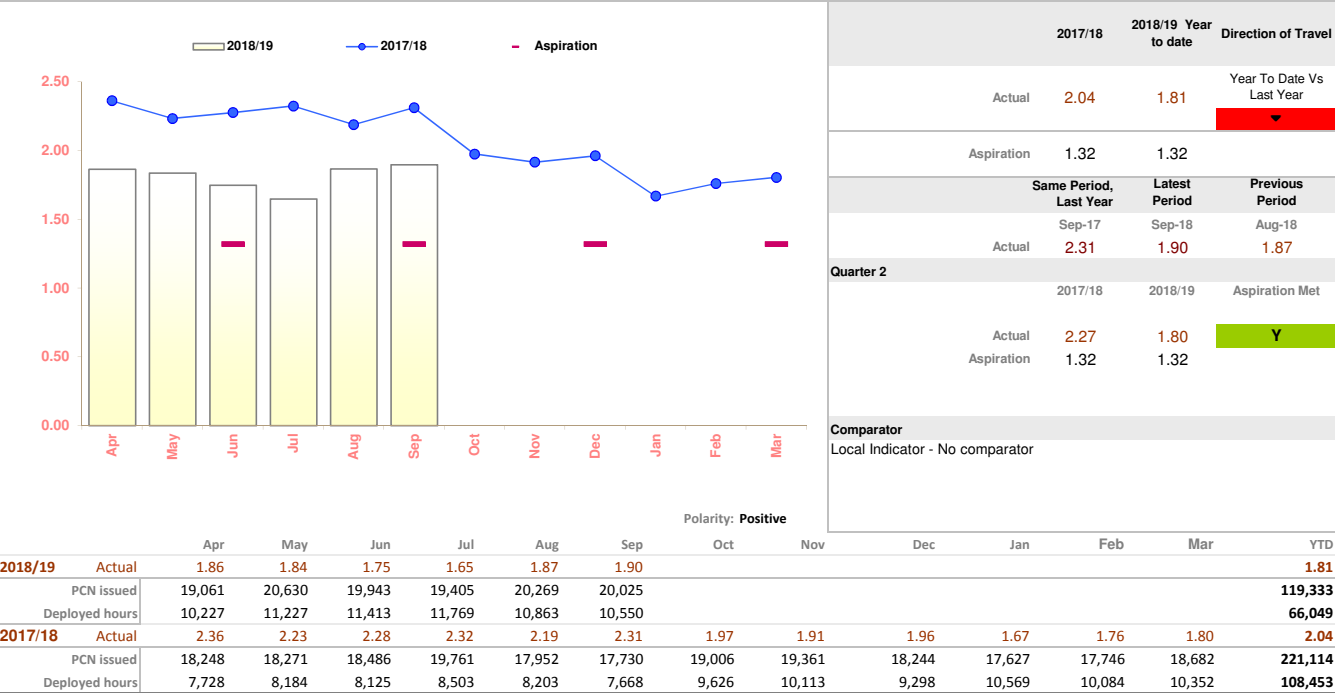
**Current Performance**

Current performance for the latest month shows that 91 enforcement actions have been undertaken, this compared with 99 actions for the same period last year. Current total enforcement actions breakdown: 308 Warnings; 13 Notices; 0 Seizures; 9 Closures; 1 Cautions; 1 Prosecutions.

The level of compliance for existing premises is improving and the service is placing a greater emphasis on supporting those businesses to achieve broad compliance. Recruitment of qualified staff remains an issue with the service currently having a vacancy factor of 30% within the food safety team. We are currently progressing recruitment for a view to address the level of vacancies. This is a measure of reactive activity so is not suitable for target setting.

Parking Contract Productivity - PCNs issued per deployed hour

Snapshot indicator



		Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19	Actual	1.86	1.84	1.75	1.65	1.87	1.90							1.81
	PCN issued	19,061	20,630	19,943	19,405	20,269	20,025							119,333
	Deployed hours	10,227	11,227	11,413	11,769	10,863	10,550							66,049
2017/18	Actual	2.36	2.23	2.28	2.32	2.19	2.31	1.97	1.91	1.96	1.67	1.76	1.80	2.04
	PCN issued	18,248	18,271	18,486	19,761	17,952	17,730	19,006	19,361	18,244	17,627	17,746	18,682	221,114
	Deployed hours	7,728	8,184	8,125	8,503	8,203	7,668	9,626	10,113	9,298	10,569	10,084	10,352	108,453

Comments

Current Performance

Current performance for the year shows that there have been 1.81 PCNs issued per deployed hour, which is a decrease in the rate of PCN's issued per deployed hour when compared with the same period last year 2.28. 119,333 PCN's have been issued this year to date, compared with 110,448 for the same period last year. There has been an increase in deployed hours (66,049 vs 48,410).

Definiton and Context

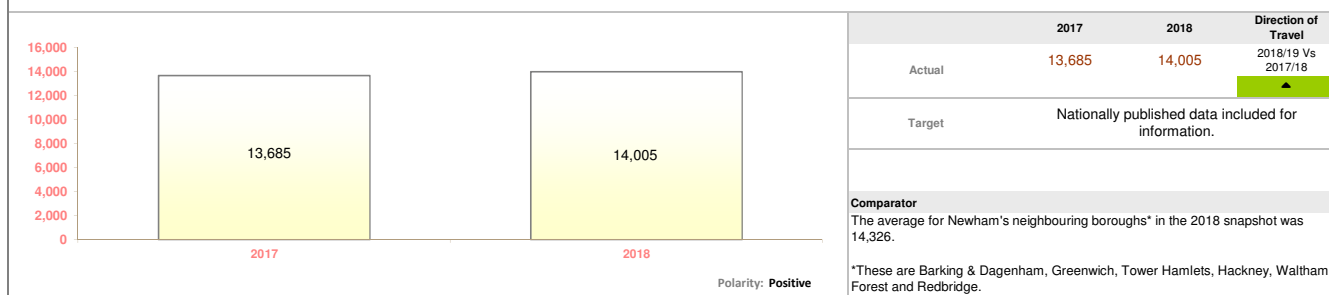
It is unlawful to set targets for any aspect of PCN issuance, however we review officer productivity to ensure the council obtains value for money from the contractor. It is important that enforcement activities are aligned to need, thus ensuring that resources are directed to both general enforcement to support fair parking policy, and to target specific, intelligence lead requirements such as repeat offending hotspots, etc.



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## **Local Economy**

Number of businesses in Newham  
(Number of local units in VAT/ PAYE-based enterprises (Inter-Departmental Business Register, ONS))



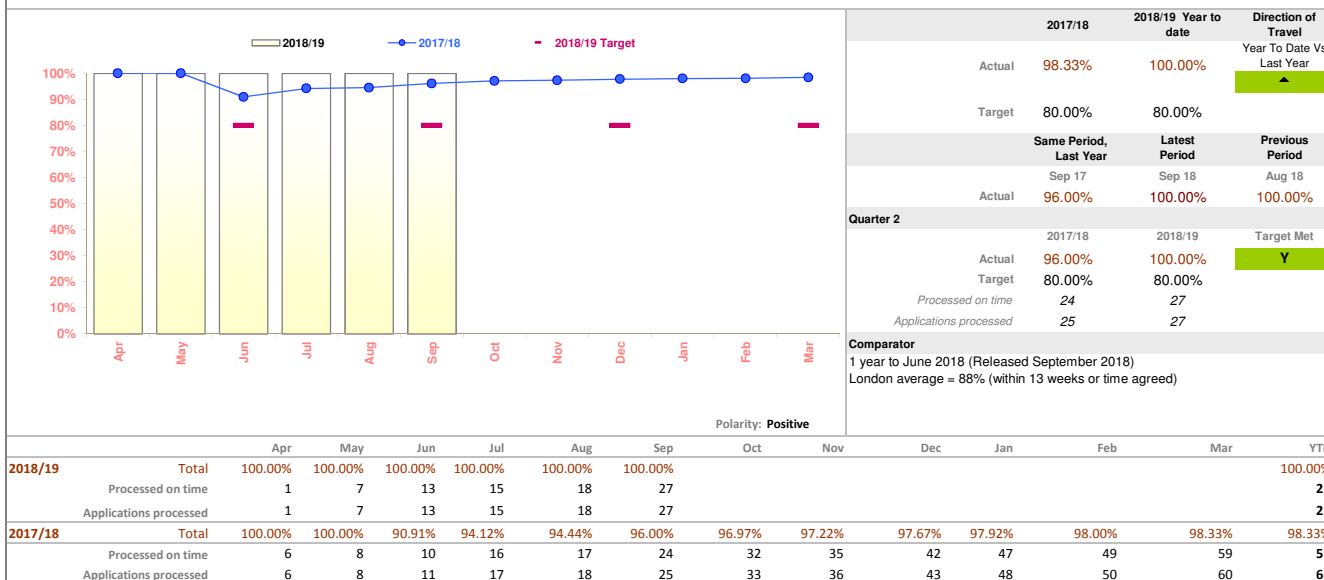
#### Comments

This dataset is drawn from a snapshot of data at the beginning of the financial year (March 2018) and was published on 3rd October 2018. The next data release is scheduled for October 2019.

This indicator is based on the number of Local Units which means that for businesses with multiple branches the indicator includes all places or work / branches in the borough.

Processing of Major Planning Applications (development of over nine residential units or 1000 square metres of commercial floor space) - proportion determined in time (within 13 weeks or in accordance with Project Planning Performance Agreement (PPPA)).

Cumulative Indicator



#### Comments

Please note that this data is for local monitoring only. Data on planning applications is submitted quarterly to the Ministry for Housing, Communities and Local Government (MHCLG) who then validate, adjust and publish this data. Please see [www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics](http://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics) for further details.

The data provided here is indicative only.

The Ministry of Housing, Communities & Local Government collect and publish local planning authority performance tables on a quarterly basis. The latest versions of the tables were published on 23 August 2018.

The criteria for assessing local planning authority performance in determining applications for major and non-major development is set by government. A local planning authority can be designated if the Secretary of State for Housing, Communities and Local Government considers that there are respects in which the authority is not adequately performing its function.

The performance of local planning authorities is assessed separately against:

- The speed of determining applications for major development;
- The quality of decisions made by the authority on applications for major development;
- The speed of determining applications for non-major development;
- The quality of decisions made by the authority on applications for non-major development.

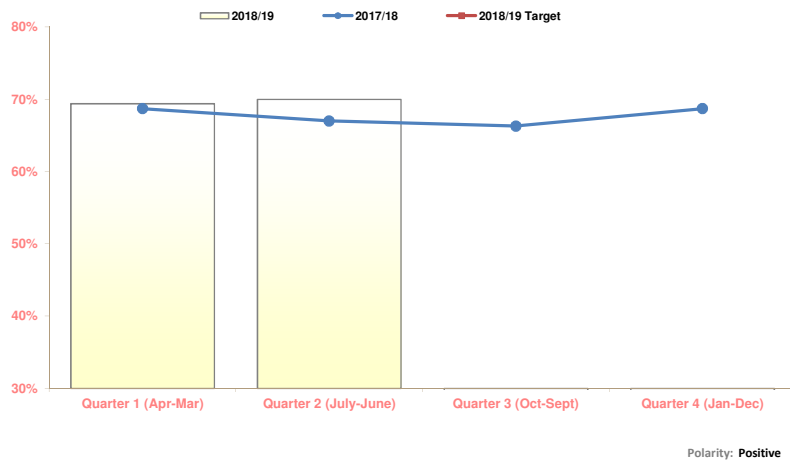
The table below provides an overview of the thresholds and assessment periods for designation in 2017 and 2018 as sent by government.

Measure and type of Application	2017 Threshold and assessment period	2018 Threshold and assessment period
Speed of major Development	50% (October 2014 to September 2016)	60% (October 2015 to September 2017)
Quality of major Development	N/A	10% (April 2015 to March 2017)
Speed of non-major Development	65% (October 2014 to September 2016)	70% (October 2015 to September 2017)
Quality of non-major Development	N/A	10% (April 2015 to March 2017)

Details for the designation in 2019 have not yet been published.

## Employment rate (Annual Population Survey, ONS)

Rolling 12 month period, reported one quarter in arrears



	2017/18	2018/19	Direction of Travel
Actual	68.7%	70.0%	Latest Period Vs Same Period Last Year ▲
Target	Nationally published data included for information.		
Quarter 2	Same Period, Last Year	Latest Period	
	2017/18	2018/19	
Actual	67.0%	70.0%	
From	Jul 16	Jul 17	
To	Jun 17	Jun 18	
<b>Comparator</b>			
July 17 - June 18 (Released October 2018)			
London average = 74.2%			
Newham is ranked 25 of 32 London Boroughs			
(Source: ONS)			

Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4	YTD
2018/19	Actuals	69.4%	70.0%		70.0%
	From	Apr 17	Jul 17		
	To	Mar 18	Jun 18		
2017/18	Actuals	68.7%	67.0%	66.3%	68.7%
	From	Apr 16	Jul 16	Oct 16	Jan 17
	To	Mar 17	Jun 17	Sep 17	Dec 17

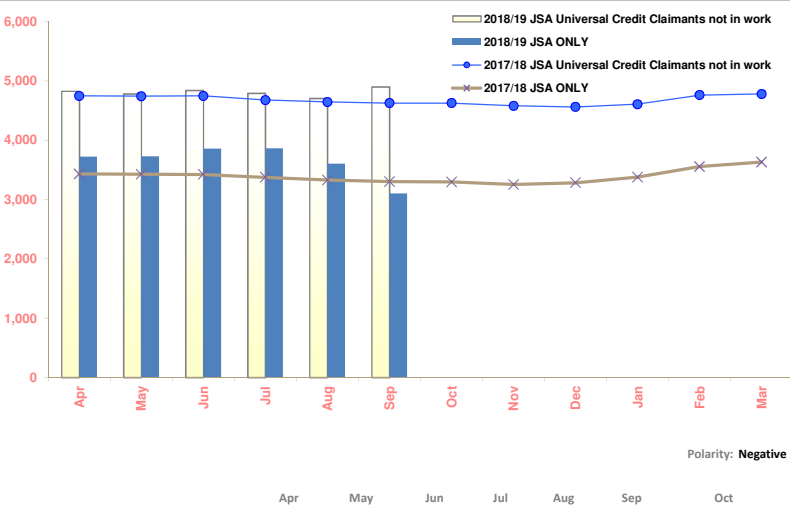
## Comments

Newham's employment rate for the 12 month period to June 2018 was 70.0%.

Please note that ONS advises that Employment rate data cannot be compared from quarter to consecutive quarter, but only from quarter to the same quarter in previous years.

## LPWa2.2

## Total Claimant Count (Displaying both Job Seekers Allowance only and Job Seekers Allowance plus Universal Credit Claimants actively seeking work)



	2017/18	2018/19	Direction of Travel
Actual	4,780	4,900	Latest Period Vs Same Period Last Year ▼
Target	Nationally published data included for information.		
Quarter 2	Same Period, Last Year	Latest Period	Previous Period
	Sep 17	Sep 18	Aug 18
Actual	4,625	4,900	4,705
Quarter 2	2017/18	2018/19	
Actual	4,625	4,900	
<b>Comparator</b>			
September 2018 (Universal Credit+JSA)			
London Claimant count as a % of working age (16-64) population (excl City of London) = 2.2%			
Newham Claimant count as a % working age population = 2.0% Rank 14/32 as a % of population.			
(Source: ONS)			

2018/19 JSA Universal Credit Claimants not in work	4,825	4,780	4,840	4,790	4,705	4,900							4,900
2018/19 JSA ONLY	3,720	3,727	3,857	3,863	3,606	3,103							3,103
2017/18 JSA Universal Credit Claimants not in work	4,745	4,740	4,745	4,675	4,645	4,625	4,625	4,580	4,560	4,605	4,760	4,780	4,780
2017/18 JSA ONLY	3,429	3,425	3,422	3,374	3,329	3,300	3,294	3,253	3,282	3,376	3,553	3,631	3,553

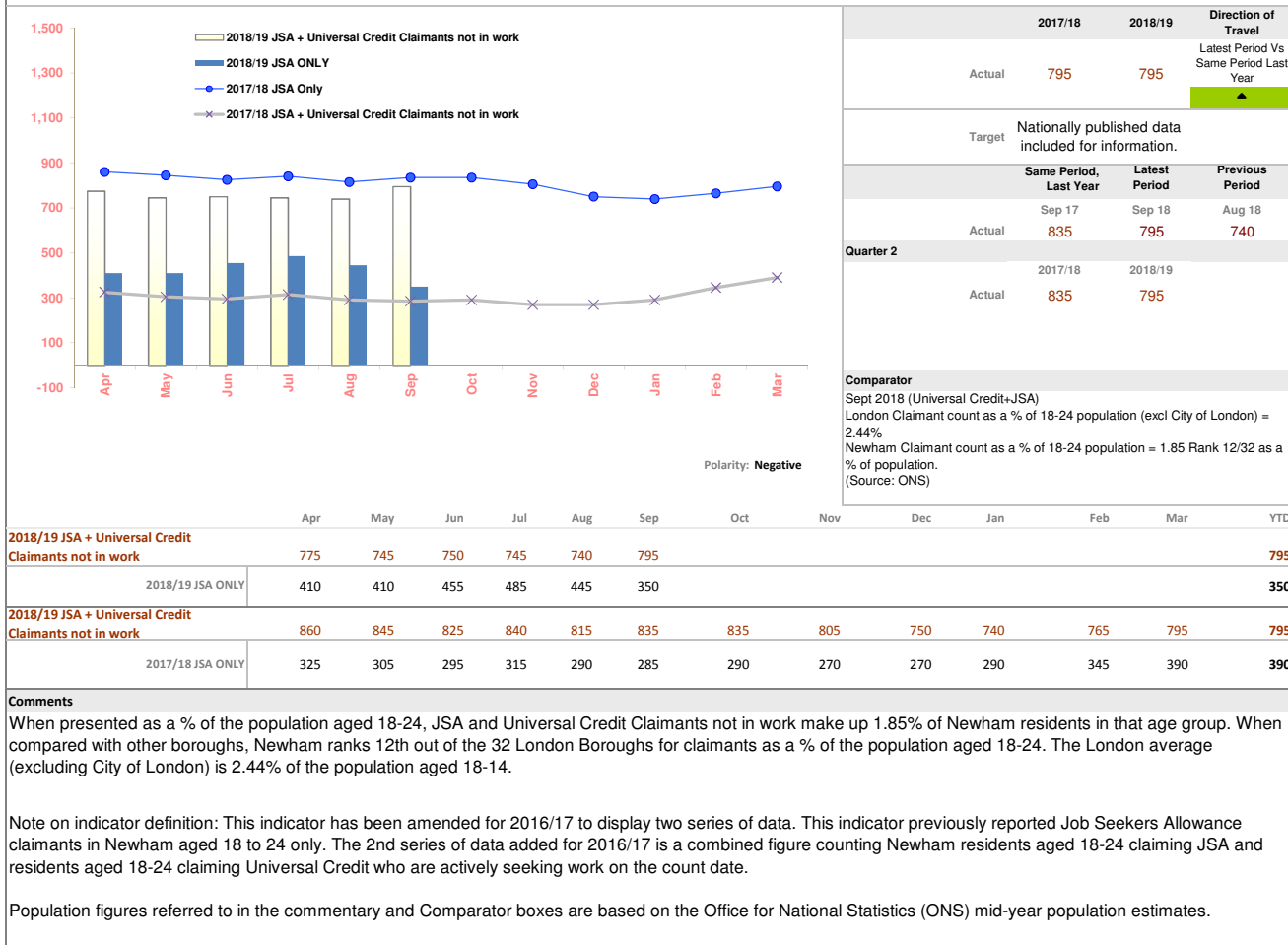
## Comments

When presented as a % of the working age population, Job Seekers Allowance (JSA) and Universal Credit Claimants not in work make up 2% of Newham residents in the 16-64 age group. When compared with other boroughs, Newham ranks 14th out of the 32 London Boroughs for claimants as a % of the working age population. The London average (excluding the City of London) is 2.2% of the working age population.

Note on indicator definition: This indicator was introduced in 2016-17 and displays two sets of figures: 1) a combined figure for Newham residents claiming JSA and residents claiming Universal Credit who are actively seeking work on the count date, and 2) Newham residents claiming Job Seekers allowance (JSA only). Universal Credit was introduced in Newham in mid-February 2016, with a phased roll out.

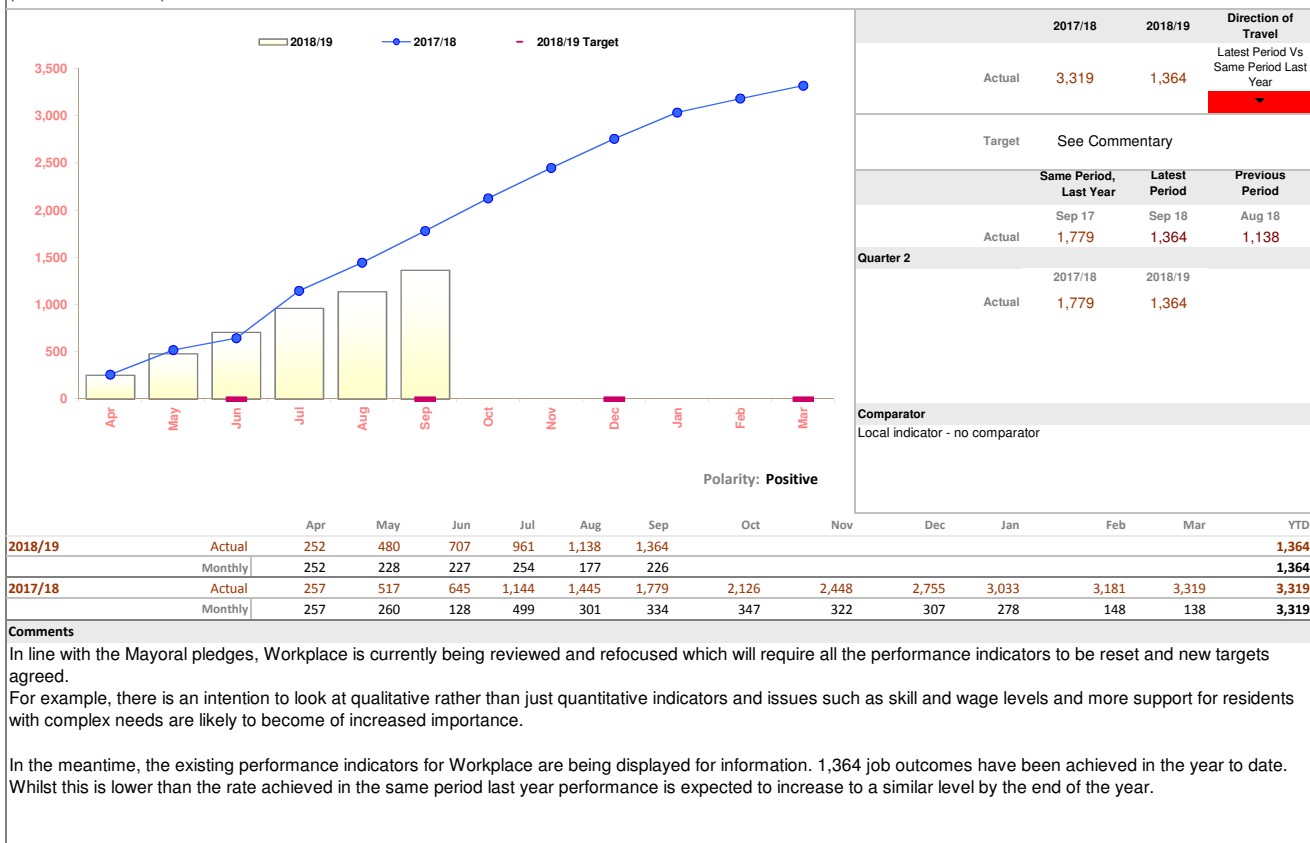
Population figures referred to in the commentary and Comparator boxes are based on the Office for National Statistics (ONS) mid-year population estimates.

Claimant Count for residents aged 18 to 24 (Displaying both Job Seekers Allowance only and Job Seekers Allowance plus Universal Credit Claimants actively seeking work)

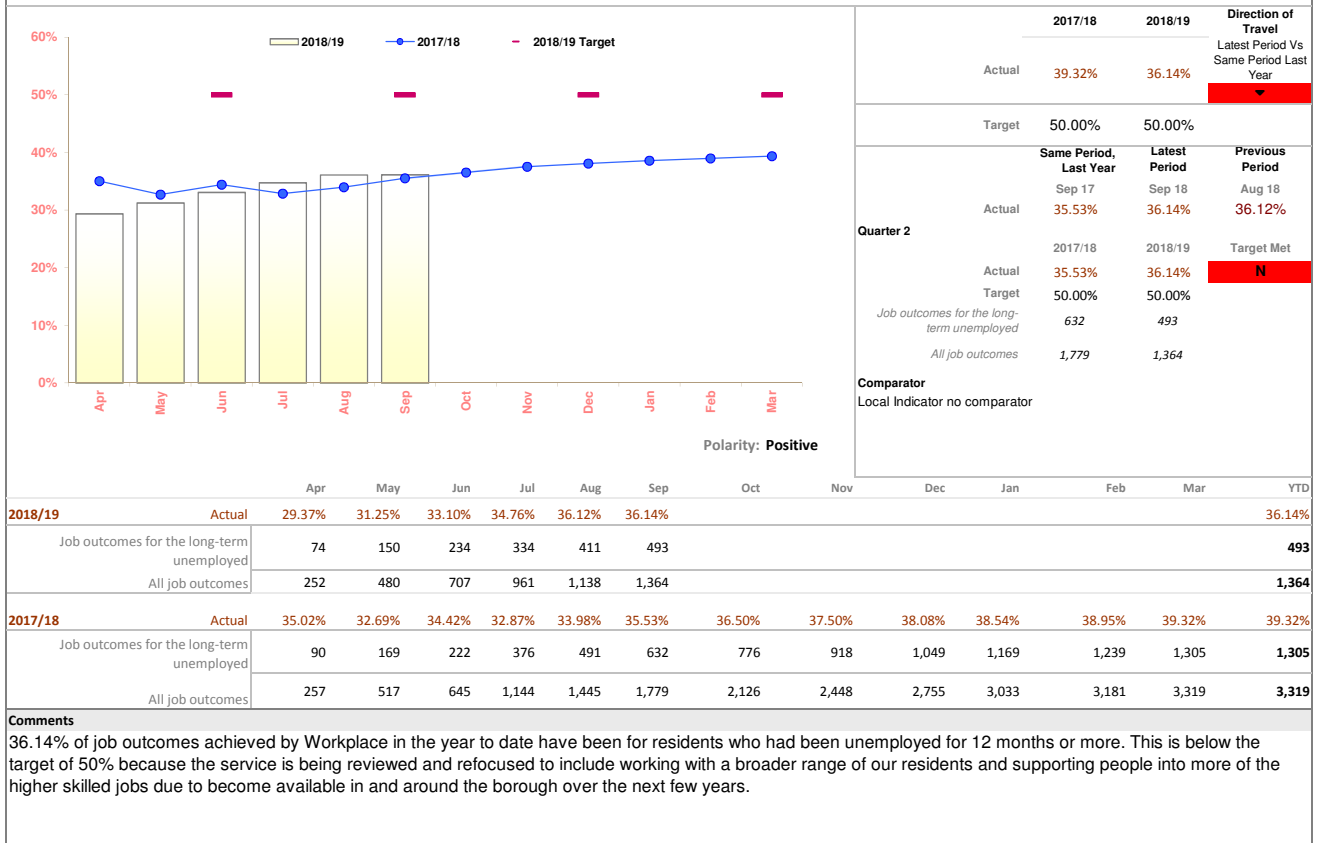


Number of residents securing a job outcome through Workplace

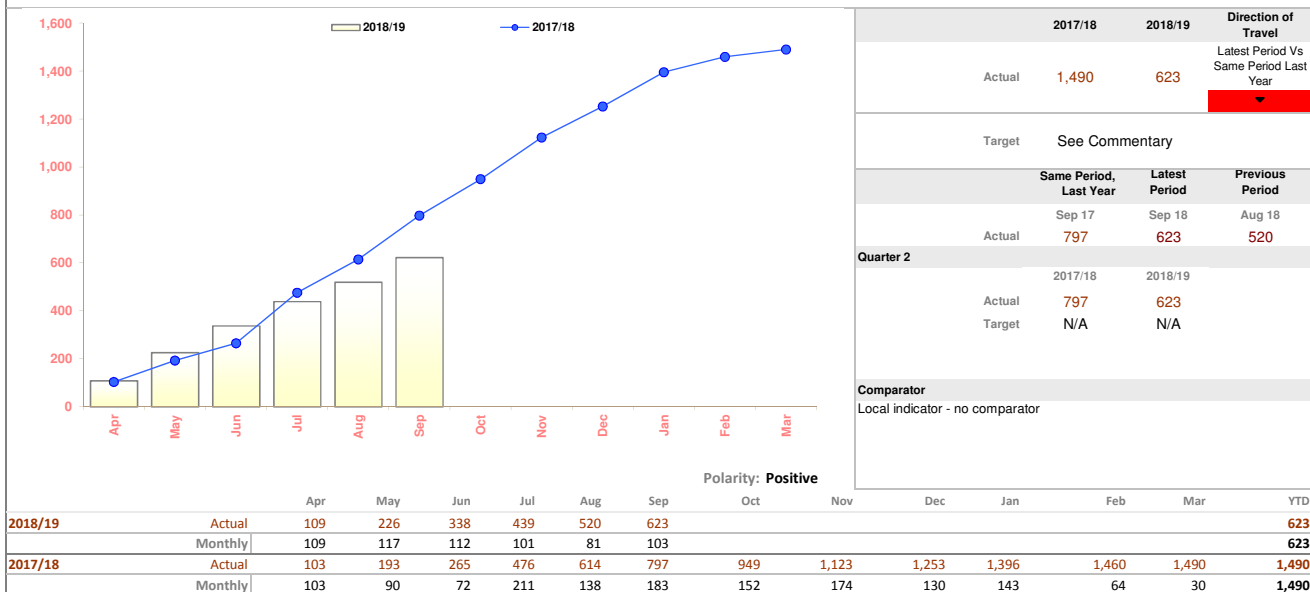
(Cumulative indicator)



Percentage of clients finding work through Workplace who were long term unemployed (12months+)  
(Cumulative Indicator)



# Number of residents aged 16-24 years securing a job outcome through Workplace (Cumulative Indicator)



## Comments

Supporting young people is a key priority for Workplace reflecting the priorities of the new administration. 623 job outcomes achieved by Workplace in the year to date have been for residents aged 16-24. This equates to 45.7% of the total job outcomes achieved through Workplace in the year to date (623 of 1354). This is an increase on the same period last year when 44.8.% of job outcomes were achieved by residents aged 16-24. Workplace will continue to focus on working with this age group.

The quality of jobs young people are supported into rather than just the total numbers is a new focus including maximising opportunities from many of the new career level apprenticeships on offer and new indicators and targets will be set as part of the Workplace review.



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# **Housing**

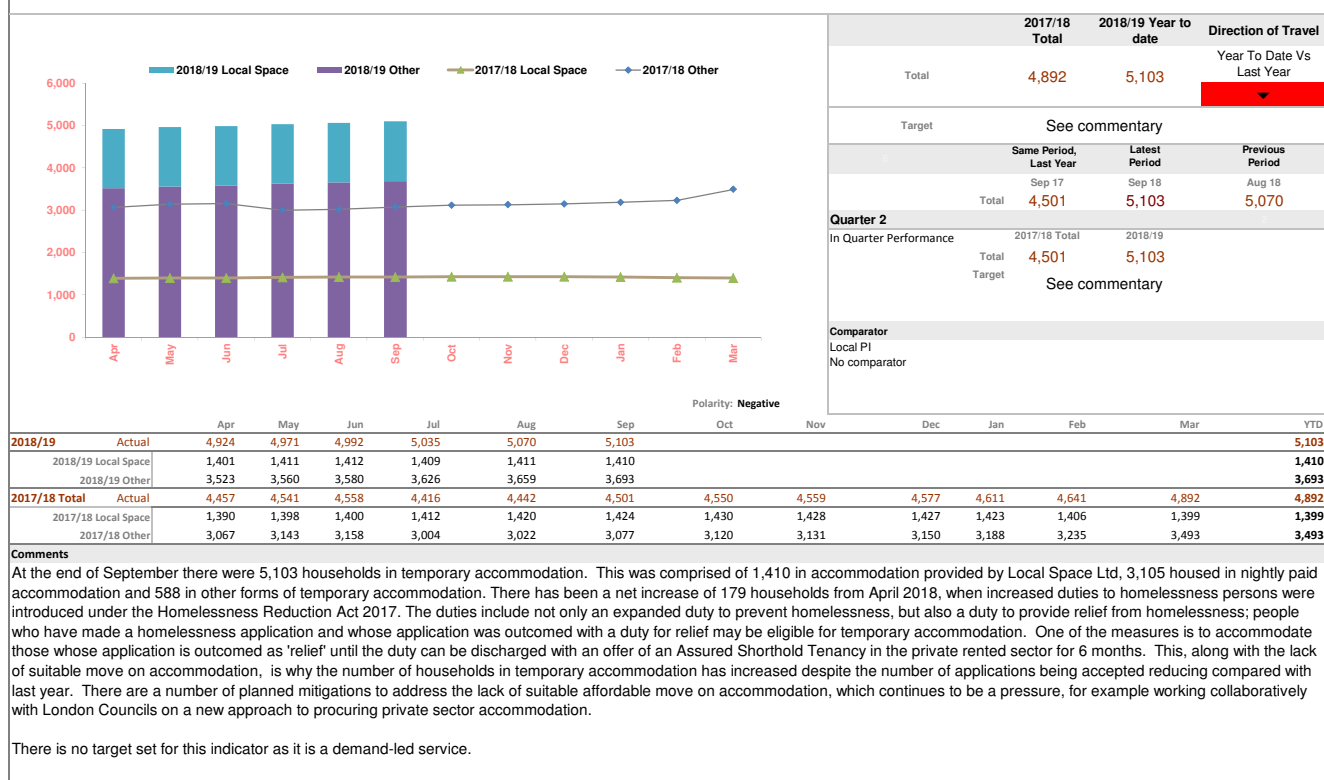
## New (HAA)

### Homelessness – Number of new applications made and number accepted as homeless

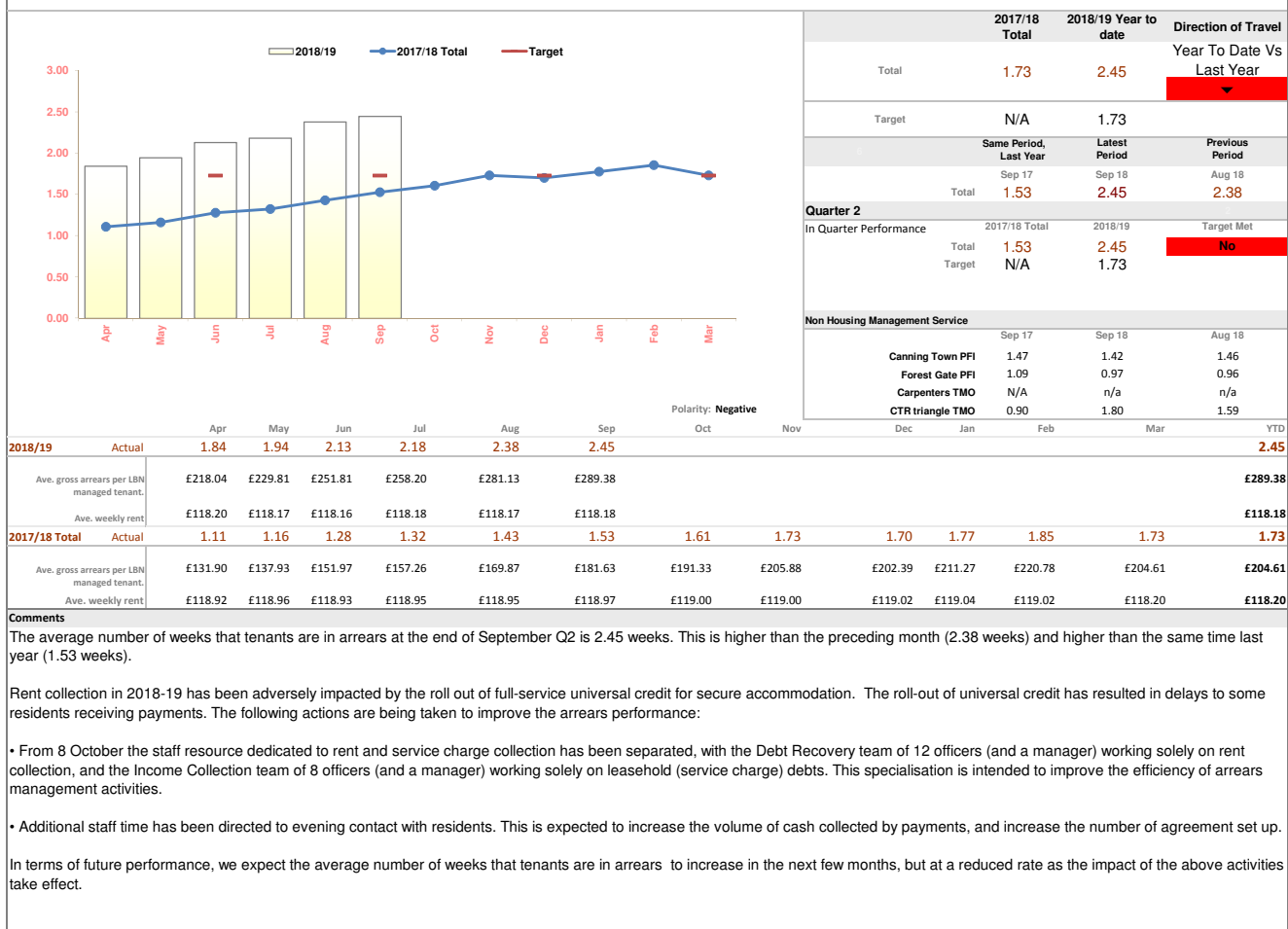
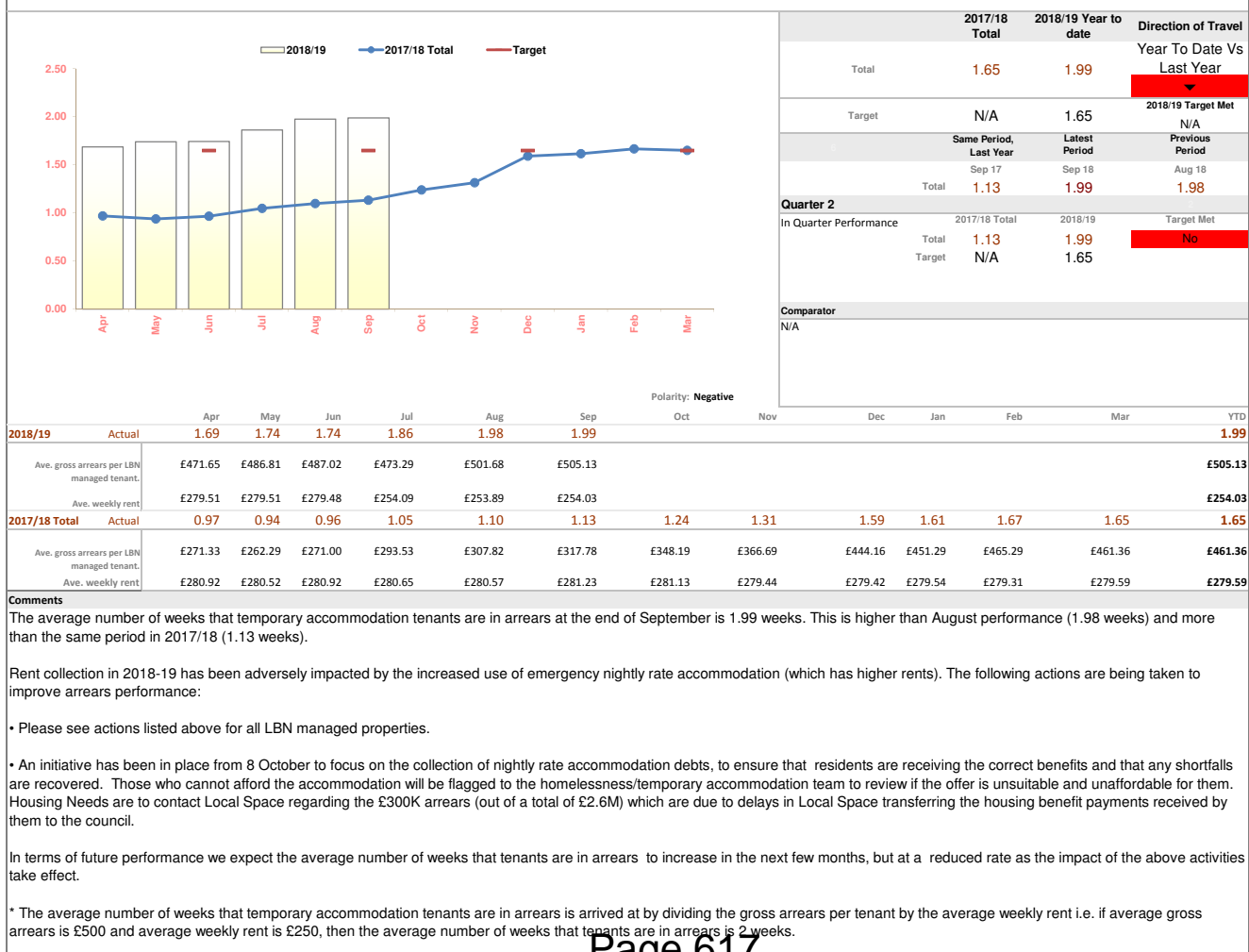


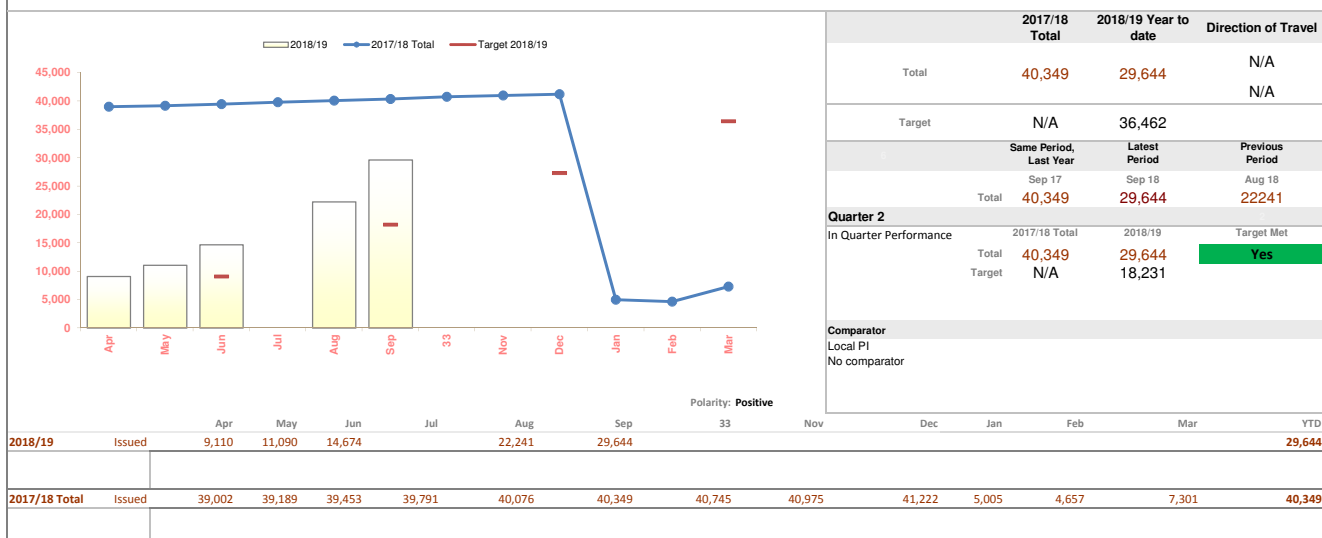
## New (NTA)

### Homelessness - Numbers in temporary accommodation



Average number of weeks tenants are in rent arrears (Snapshot) LBN Managed Properties.

Average number of weeks temporary accommodation tenants are in rent arrears (Snapshot).  
(Ave. gross arrears per temporary accommodation tenant)

Private sector rented properties licensed  
(cumulative)

## Comments

At the end of Q2 2017-18, the number of private sector rented properties licenced stood at 29,644, which is believed to be over 77% of the licensable population. (Note: this indicator refers to the number of licences issued not properties - a property may have more than one licence i.e. a property subdivided into a number of flats)

The Additional House in Multiple Occupation (HMO) Licensing scheme became effective from 1st January 2018 and the Selective Licensing Scheme (covering single household rented properties) became effective from 1st March 2018 due to a delay in receiving the Secretary of State's confirmation which is legally required. However, the end of the early rate (£400) was extended until the 29th March 2018, to help landlords prepare their applications, following feedback we received at the time.

Key priorities for the whole service will be on:

- Managing/processing large volumes of applications/enquiries over next 12 months
  - Taking action against criminal landlords to protect tenants and the public, through dealing with the hidden HMO population and poor housing conditions.
- Monthly performance data is produced to evidence this.

The Private Housing Council Tax Team broke the £5 million barrier, by identifying additional Council Tax owed by HMO Landlords.

The Property Licensing Team were also joined on early morning visits by our Mayor, Cllr. Gray, Lord Kennedy and Lord Young and we continue to be asked to assist other local authorities.

## New (PSLE)

Private sector licensing – Enforcement activity, prosecutions, ASB.  
(Cumulative)

## Comments

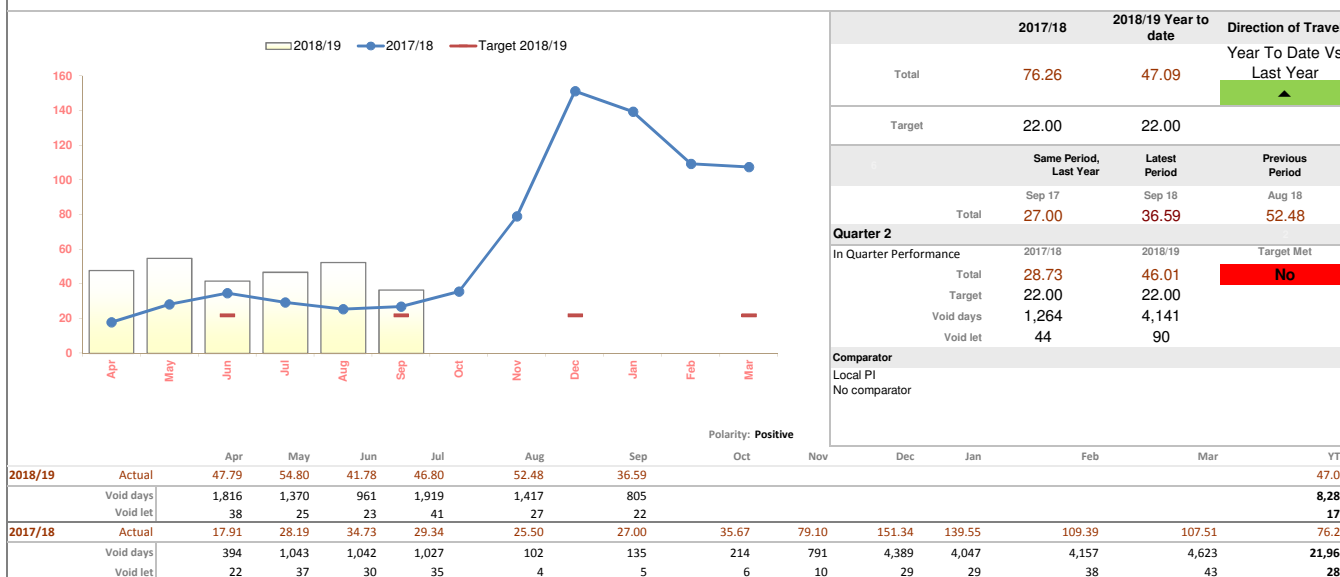
This year to date, 96 enforcement notices have been issued (a notice served by the council to carry out an action and where failure to carry out the action becomes an offence). There have also been 42 Civil Financial Penalties (issued as an alternative to prosecutions) and 2 prosecutions this year to date.

The service now only counts Final Civil Penalties and not Intention to issue Notices for a more accurate recording of enforcement outcomes (as intention to issue notice may not lead to a notice or penalty). This means that data from 2018/19 is not directly comparable with data from 2017/18. Morning enforcement operations had poor target outputs (improvements in standards) earlier in the year but extra work to seek out properties with the lowest standards and lowest compliance has now resulted in better outputs.

Technical support resources diverted to cope with the peak of property licensing processing will, from the end of October, be gradually returned to support the Enforcement Team. This should also improve our enforcement outputs and drive the currently unlicensed landlords to get a licence.

There is no target set for this indicator as enforcement notices are issued as and when appropriate. For the same reason, the direction of travel is not RAG-rated, it simply shows whether the volume of notices and prosecutions has increased or decreased.

## Average time taken to re-let Local Authority Housing - Redevelopment and Lettings, inc. Sheltered (days)



## Comments

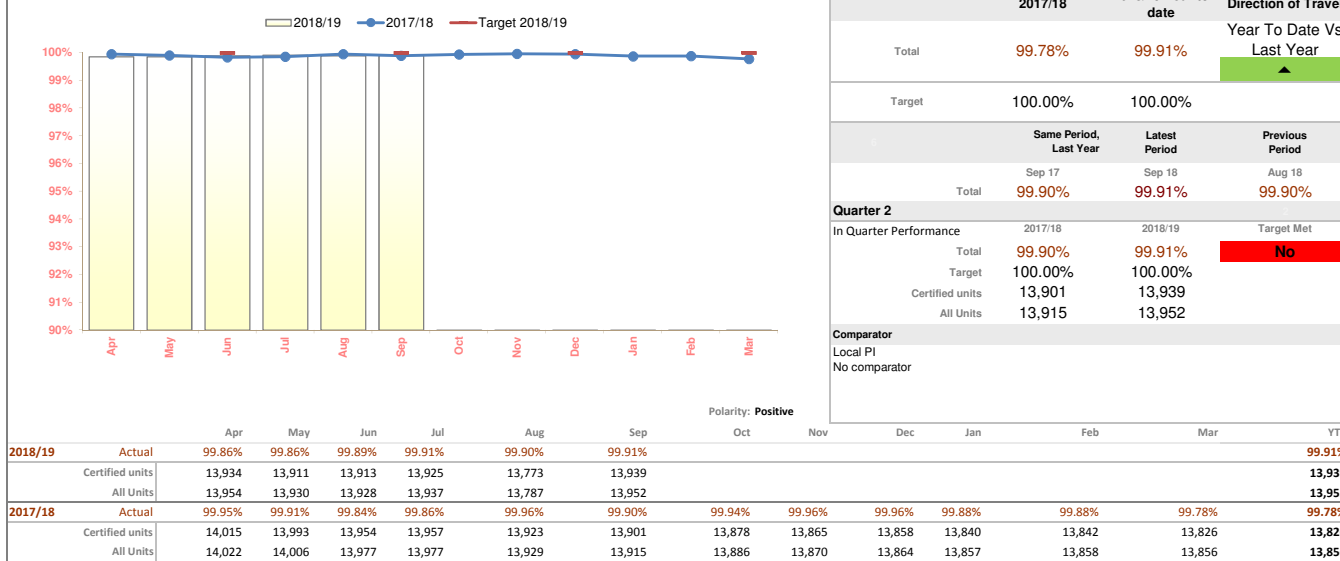
At the end of September, the average re-let time was 47.09 days. This performance includes the impact of holding some properties for potential decanting of tall blocks for recladding following the Grenfell fire. These have now all been let apart from a couple in the blocks where the council is carrying out remedial works and these will be let once the works are complete. Performance for the month of September was 36.59 days which was worse than for the same period last year but better than the preceding month (52.48). The general trend is towards normalisation. In the past six months, there has been a significant reduction in the average re-let time. This is due to the volume of major works let in the period (10 out of the 22 voids).

Note: this PI measures voids at the point of letting and not the total number of voids the Repairs and Maintenance Service team is dealing with. It includes all properties that the LA has taken possession of but excludes properties let through mutual exchange, those undergoing major works and those that the council intends to sell or demolish.

## HM23

## Percentage of units with a current gas safety certificate

(snapshot indicator)



## Comments

99.91% of units had a gas safety certificate at the end of September 2018. The target for this PI is 100%. Attempts have been made to increase the number of applications that can be made per month to enforce entry, in negotiation with the local courts, but courts have not allowed an increase to date. It currently takes three working days from a successful court hearing to enforcing entry and completing the required gas service.

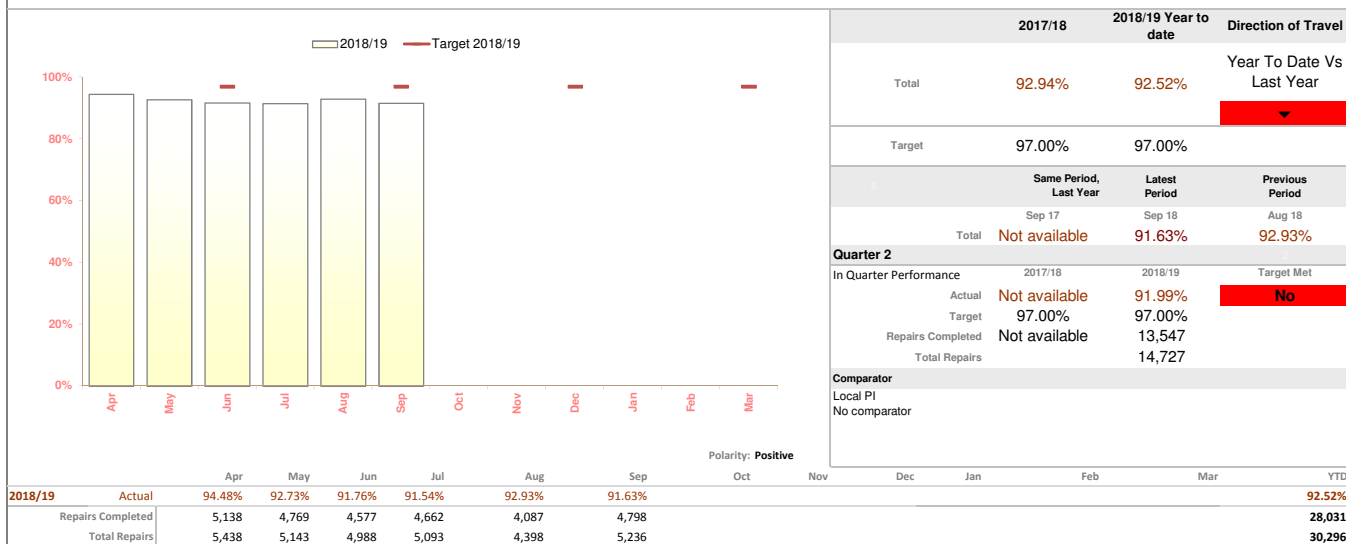
At the end of September there were 22 cases that were outstanding for less than one month. There were no cases outstanding for more than one month and 7 warrants were issued.

The service starts the process to gain entry to undertake inspection two months before the certification is due to end with the contractor sending three letters and the council sending a further three letters before seeking warrants for entry.

The service is using other methods alongside formal proceedings: cold calling, stickering locks and doors, working with Resident Services Officers and combining actions, and have engaged two sub-contractors who are paid only on completion. The contractors cold call continuously over seven days, carding and stickering doors. Carding and stickering has resulted in a number of residents contacting the council directly and access was gained by the council's own engineers.

The majority of tenants do grant access to the council on receipt of the council's final written warning without the need for the warrant but there are a persistent number who do not. Ahead of any tenancy changes the service has included a clear warning to tenants that where access has been refused, the service will be raising a charge. These actions have only recently been implemented and the service is in the process of assessing the impact of these changes. Currently LBN is reviewing changes to the tenancy terms and conditions that would enable quicker access as a health and safety emergency.

## Total housing repairs completed within target



## Comments

Of the 5,236 repairs completed to date, 92.52% have been completed within timescale. This falls below the overall performance target to complete 97% of repairs in time. A backlog of work accrued while the service was being reviewed. The service is targeting the backlog and complaints which has been leading to an increase in the number of days to complete work. Going forward, as the backlog clears, the service aims to complete all routine repairs within five working days. Performance is to be kept under review.

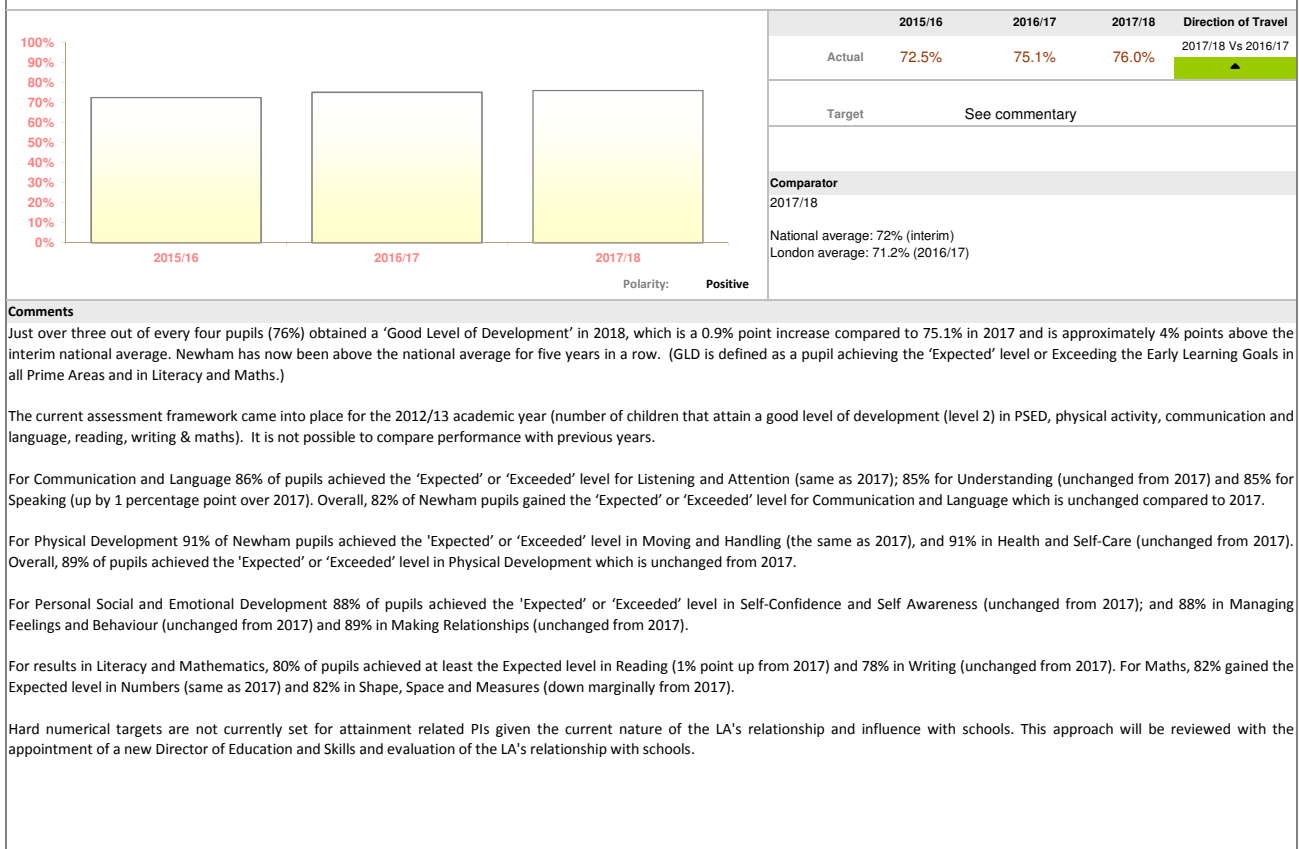
Please note that there is no monthly data available for 2017/18 hence it is not displayed here.

## **Children and Young People**



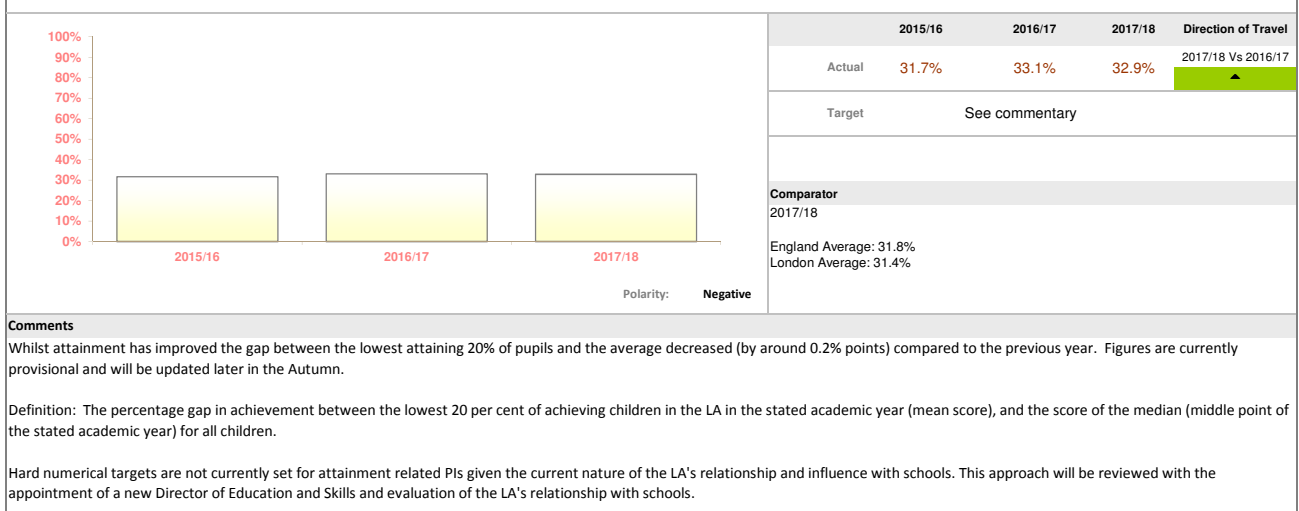
## EYFS (Early Years Foundation Stage) - Good Level of Development.

Children achieving a good level of development are those achieving at least the expected level within the following areas of learning: communication and language; physical development; and personal, social and emotional development; literacy; and mathematics.



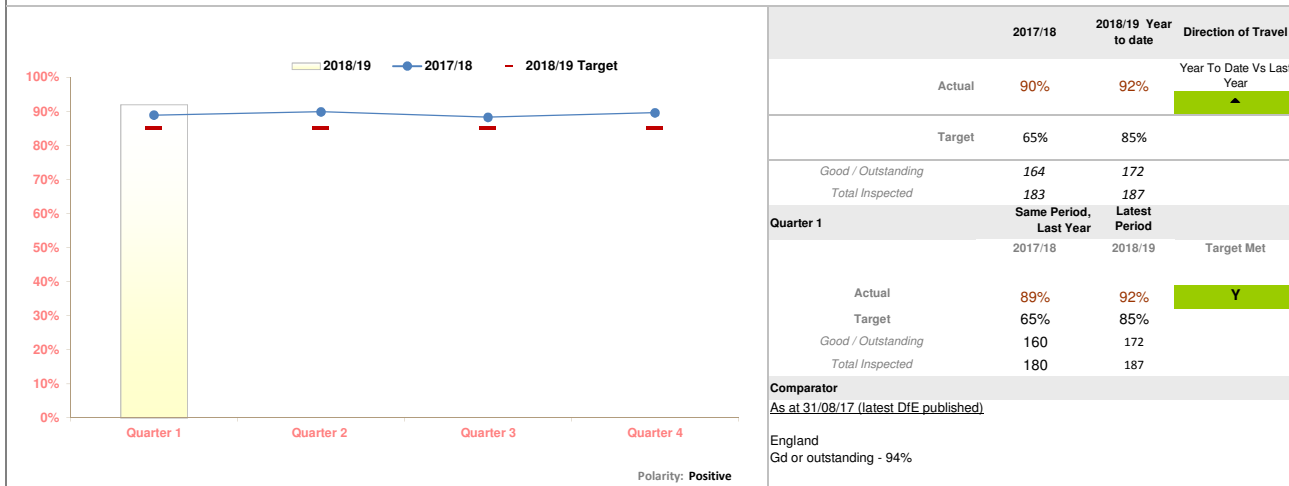
## Early Years Foundation Stage

Narrowing the gap between the lowest achieving 20% in the Early Years Foundation Stage and the rest



% of early education settings rated as Good or Outstanding by Ofsted Judgements at the most recent inspection.

#### Cumulative



Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4	YTD
2018/19 Actual	92%				92%
Good / Outstanding	172				172
Total Inspected	187				187
2017/18 Actual	89%	90%	88%	90%	90%
Good / Outstanding	160	160	158	164	164
Total Inspected	180	178	179	183	183

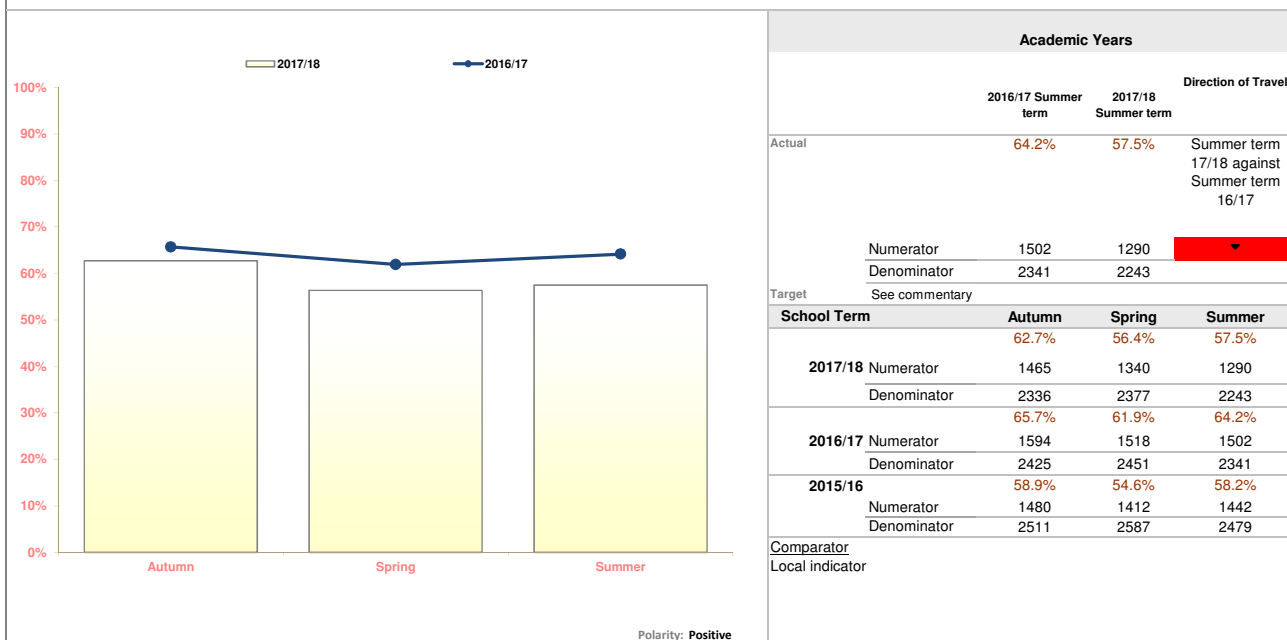
#### Comments

The data shows the overall rating of active early years providers at their most recent inspection. It shows that out of 187 providers with a valid Inspection judgement as of the end of Quarter 1, 172 were judged Good or Outstanding. The data presented does not include those judged as Met or Not Met (which means there were no children on role at the time of inspection), or those settings that have not yet had their first inspection.

All childminders that have received Inadequate or Requires Improvement Ofsted judgements are being supported by children's centre Early Education Practitioners with reference to DfE learning development, safeguarding and welfare. The Learning & Achievement service also offers tailored training delivered or commissioned by the LA, devised in response to actions raised by Ofsted or by the LA. Settings which are Inadequate are not advertised to parents online until at least a Requires Improvement judgement is reached at a subsequent inspection. Settings which receive a judgement of Requires Improvement cannot provide eligible 2 year old places, but can provide eligible 3 and 4 year old places. These settings will be advertised to parents, however they will also receive intensive support from the Learning and Achievement Service to improve their judgement. If a setting is judged as Inadequate or Requires Improvement, then parents will be supported to find an alternative setting.

Data is based on inspections carried out since the introduction of the Early Years Foundation Stage (EYFS) in 2008.

## % take up of eligible 2 year olds of the 15 hour Early Education Funding offer



## Comments

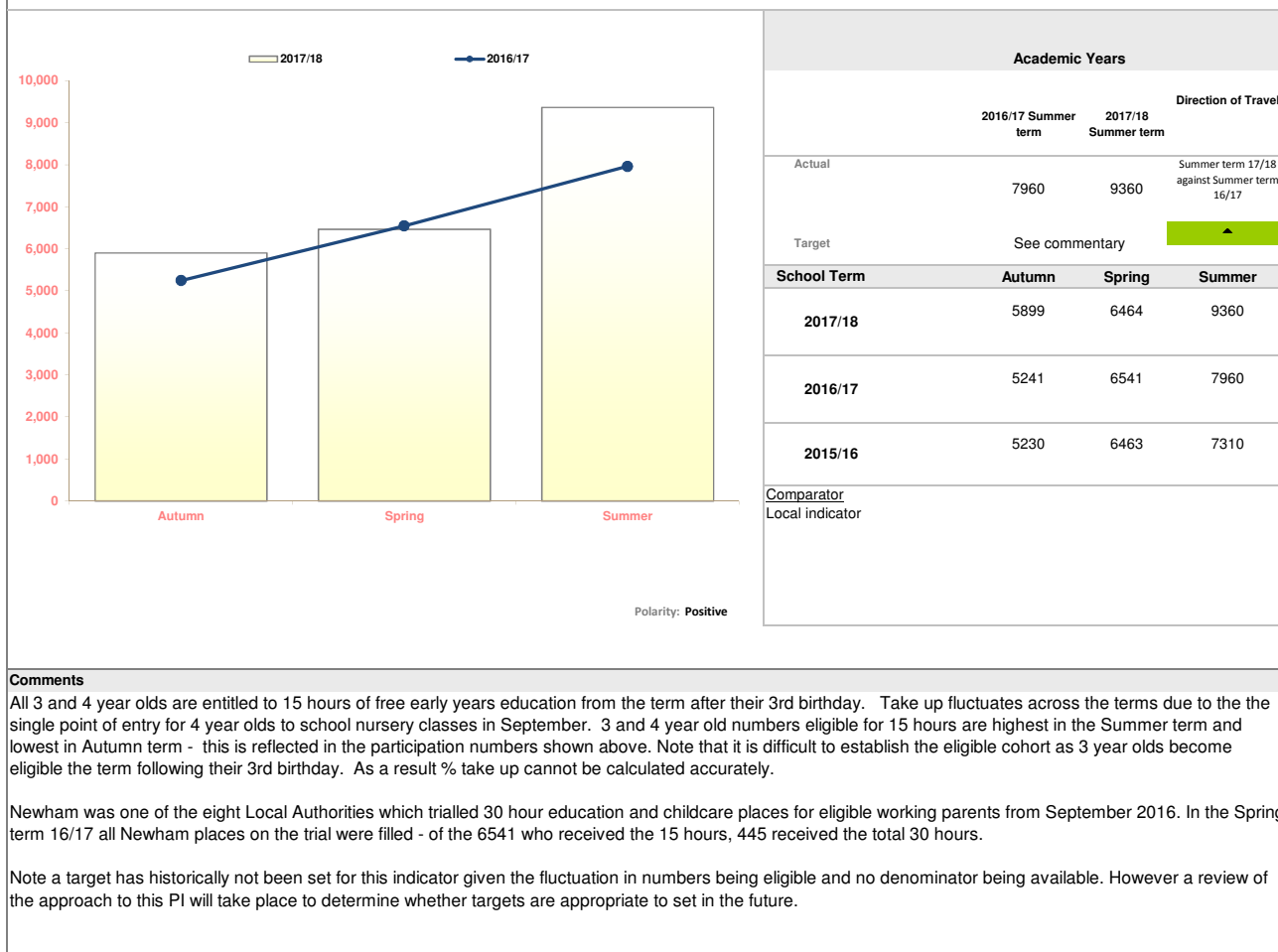
The number of eligible 2 year olds continues to fall compared to the same quarter in previous years, and uptake has dropped with a take-up rate of 57.5% (1,290) across Newham in the Summer term 2017/18. This is a decrease of 6.7% points compared to the 2016/17 Summer term. The last national comparison of 2 year old take up (Jan census 2018) showed that overall take up was marginally increased against Jan 2017 (England 71% > 72%, London 58% > 61%, Inner London 55% to 60%). Newham had a take-up of 50% in January 2018 (statistics for our Neighbours are: Tower Hamlets 47%, Waltham Forest 48%, Greenwich 56% and Barking and Dagenham 78%). Analysis of take-up data shows that wards with the least spaces available have the lowest rate of resident families participating (Boleyn, Plaistow South, Plaistow North and Canning Town South).

Children's Centres are offering eligibility surgeries on a regular basis so that parents can be informed and check if they meet the criteria. Eligible parents are then connected to spaces available in the Neighbourhood. Data on families likely to be eligible has also improved as Children's Centres are now given any available phone numbers rather than just addresses. This means that families are contacted more easily. Promotion with partners including schools and health centres, as well as outreach sessions in key locations such as GPs and libraries have also helped to improve take-up. Dedicated posts are funded in each Community Neighbourhood - the focus of these roles is to support Childminders in the area and support parents to access childcare, particularly eligible families.

From Autumn 2014, Local Authorities have had a statutory duty to provide free early education for disadvantaged two-year-olds. The DWP determines who are likely to be eligible children against a set criteria, therefore % take up can be presented. Eligible families can access places from the term after the child's second birthday. The maximum entitlement is 570 hours across a year. The childcare offer is most commonly accessed 15 hours per week in term time but there is now a range of providers offering stretched free entitlement across the year. Although provision is a statutory duty, take-up by families is on a voluntary basis and families will not always take-up childcare in the Neighbourhood in which they live.

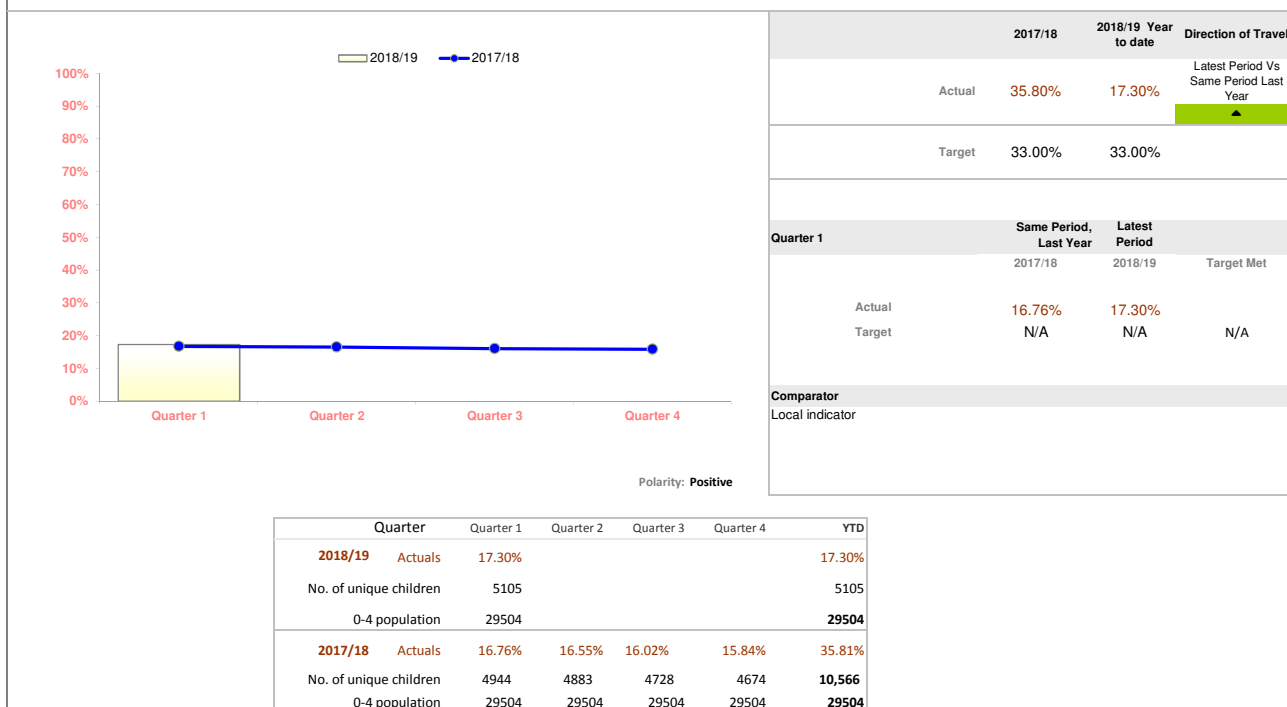
Note a target has historically not been set for this indicator given the timeliness and accuracy of the DWP data and the churn in Newham, however a review of the approach to this PI will take place to determine whether targets are appropriate to set in the future.

## Number of 3 and 4 year olds taking up the 15 hour Early Education Funding offer (count)



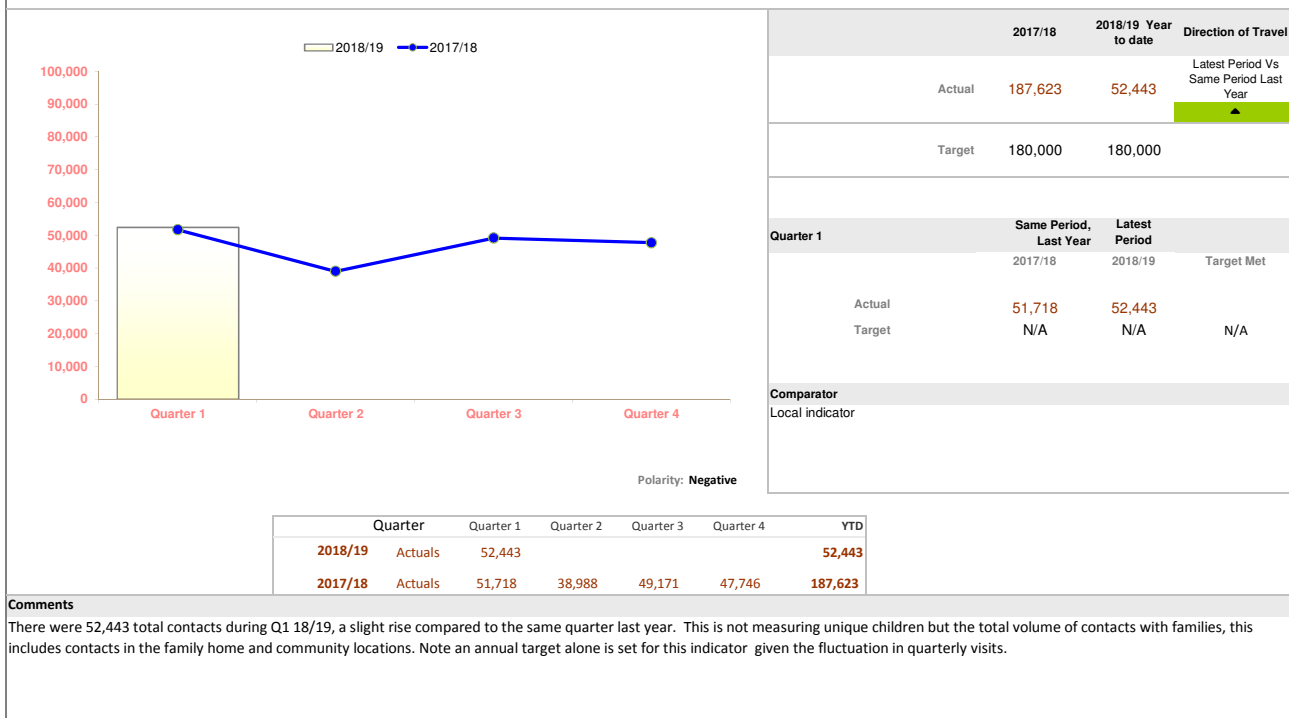
## CBS5.0 % of unique children attending Children's Centres

## % of unique children attending Children's Centres (unique to quarter and unique in the year to date)



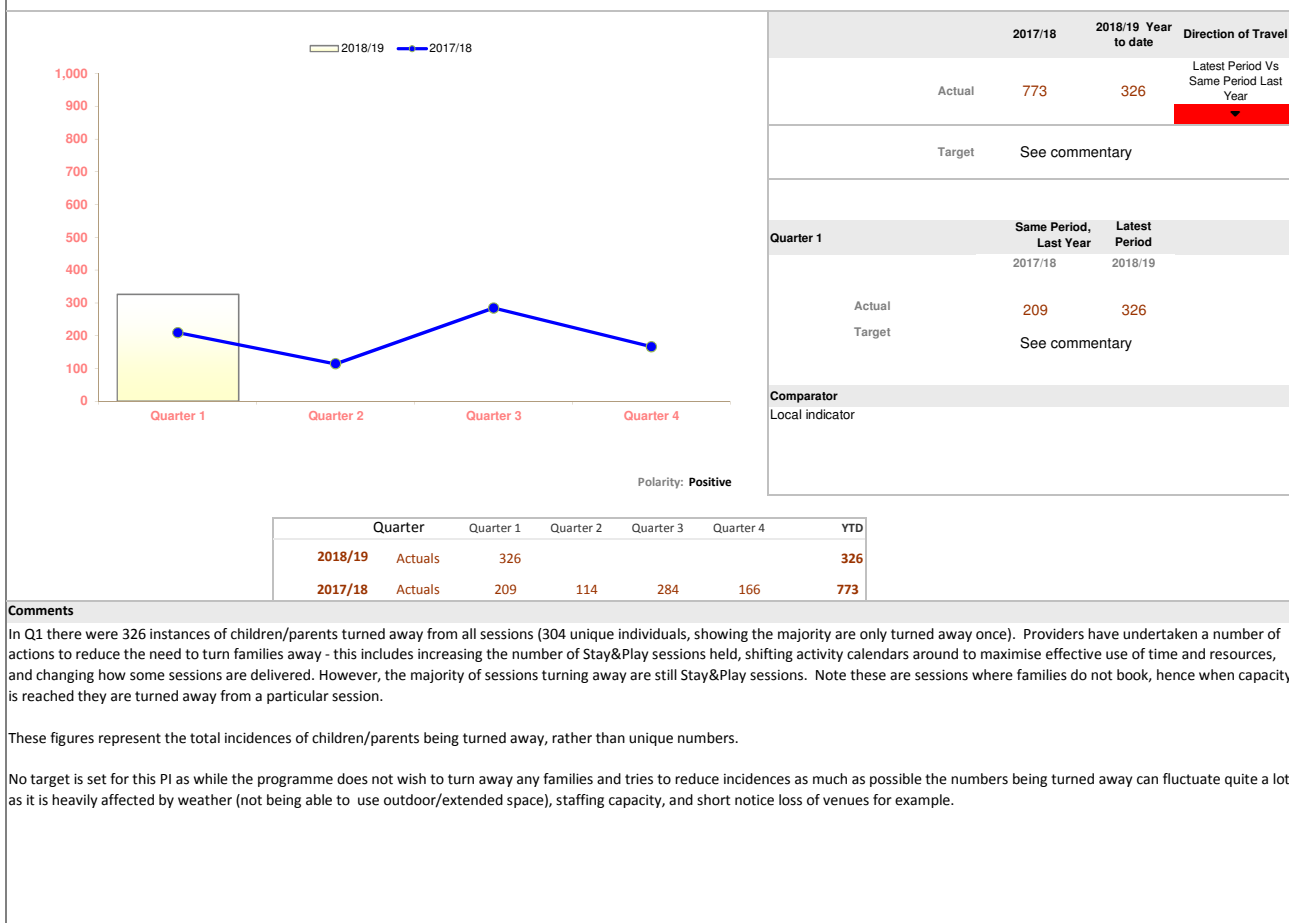
### CBS5.1- Number of visits to children's centres

Number of visits to children's centres (total volume of contacts)



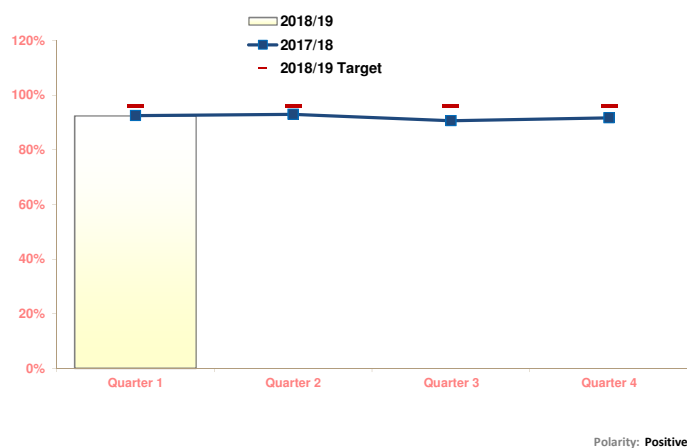
### CBS5.2- Number of children/parents turned away from all sessions

Number of children/parents turned away from all sessions



**CBS6.0 % of eligible children receiving New Birth Visit within 14 days.**

% of infants who turned 30 days in the quarter who received a face-to-face New Birth Visit (NBV) within 14 days from birth, by a Health Visitor with mother (and ideally father).



	2017/18	2018/19 Year to date	Direction of Travel
Actual	92.0%	92.4%	Quarter On Quarter
Target	96.0%	96.0%	
Quarter 1	Same Period, Last Year	Latest Period	Target Met
	2017/18	2018/19	
Actual	92.5%	92.4%	N
Target	96.0%	96.0%	
Comparator			
London 91.9%			

Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4	YTD
<b>2018/19 Actuals</b>	<b>92.4%</b>				<b>92.4%</b>
No. receiving visit	1255				1255
No. turning 30 days	1358				1358
<b>2017/18 Actuals</b>	<b>92.5%</b>	<b>93.0%</b>	<b>90.7%</b>	<b>91.7%</b>	<b>92.0%</b>
No. receiving visit	1327	1406	1323	1264	5,320
No. turning 30 days	1434	1512	1459	1403	5808

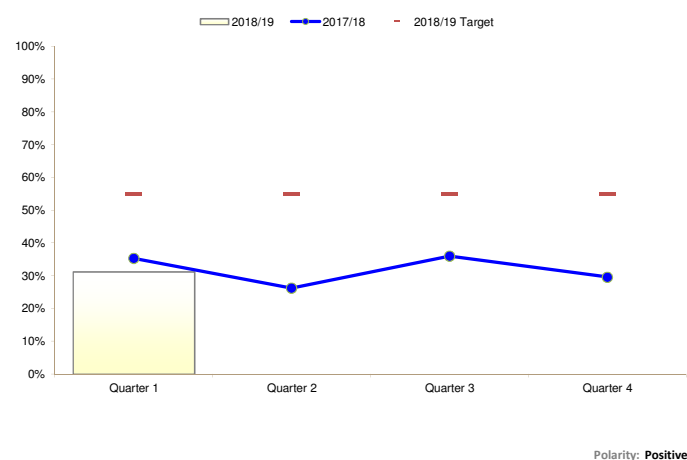
**Comments**

92.4% of infants who turned 30 days in 18/19 Q1 received a face to face New Birth Visit by a Health Visitor within 14 days of the birth. Although the PI is still under target, positive progress is being made to improve the number of visits taking place within timescales. The target for the PI has been benchmarked against London comparator boroughs (aggregate London performance 91.9%).

Additional Health PIs have been suggested for Q3 to include the full range of statutory health checks which will provide a fuller picture of reach.

**CBS6.1- % of eligible children receiving 12 month check**

% of children who turned 12 months in the quarter, who received a 12 month review, by the age of 12 months. Reported quarterly in arrears.



	2017/18	2018/19 Year to date	Direction of Travel
Actual	31.77%	31.22%	Quarter On Quarter
Target	55.00%	55.00%	
Quarter 1	Same Period, Last Year	Latest Period	Target Met
	2017/18	2018/19	
Actual	35.31%	31.22%	N
Target	55.00%	55.00%	
Comparator			
London 49.90%			

Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4	YTD
<b>2018/19 Actuals</b>	<b>31.22%</b>				<b>31.22%</b>
No. receiving a review	458				458
No. turning 12 months	1467				1467
<b>2017/18 Actuals</b>	<b>35.31%</b>	<b>26.20%</b>	<b>35.97%</b>	<b>29.57%</b>	<b>31.77%</b>
Numerator	519	388	518	406	1,831
De-nominator	1470	1481	1440	1373	5764

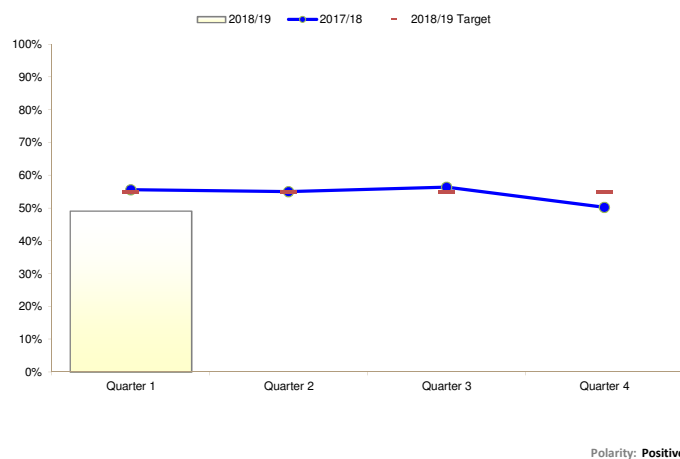
**Comments**

31.22% of children who turned 12 months in 18/19 Q1 received a 12 month review by the age of 12 months. The Health visiting Service has now transferred to LBN and work will be undertaken with the service to continue to improve the take-up rate. The target for the PI has been benchmarked against London comparator boroughs (aggregate London performance 49.90%).

Additional Health PIs have been suggested for Q3 to include the full range of statutory health checks which will provide a fuller picture of reach.

**CBS6.2- % of eligible children receiving 2 - 2.5 year review**

% of children due a review by the end of the quarter, who received a 2-2.5 year review, by the age of 2.5 years.



	2017/18	2018/19 Year to date	Direction of Travel
Actual	54.21%	49.10%	Year To Date Vs Last Year
Target	55.00%	55.00%	
Quarter 1			
	Same Period, Last Year	Latest Period	Target Met
	2017/18	2018/19	
Actual	55.57%	49.14%	N
Target	55.00%	55.00%	
Comparator			
London 58.30%			
England (completed using ASQ-3) 89.40%			

Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4	YTD
2018/19 Actuals	49.14%				49.14%
No. receiving a review	742				742
No. turning 2.5 years	1510				1510
2017/18 Actuals	55.57%	55.06%	56.36%	50.25%	54.21%
Numerator	793	778	820	799	3,190
De-nominator	1427	1413	1455	1590	5885

**Comments**

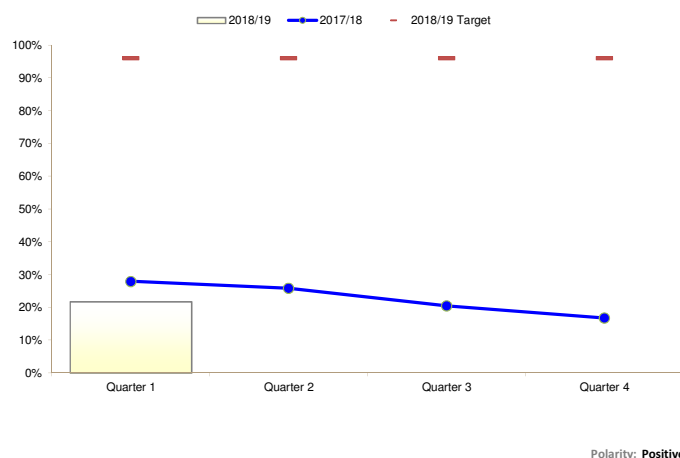
The 2-2.5 year review is an optional review for parents to take up but is offered to all parents by the Health Visiting service. Commissioners are currently incentivising or making it easier for parents to take up the 2-2.5 year old check by introducing an integrated check across health, child development and wellbeing.

During 18/19 Q1, 49.14% of those eligible took up their 2.5 year review. The target for the PI has been benchmarked against London comparator boroughs (aggregate London performance 58.30%).

Additional Health PIs have been suggested for Q3 to include the full range of statutory health checks which will provide a fuller picture of reach.

**CBS6.4 % of infants recorded as being totally and partially breastfed at 6-8 wks.**

% of infants recorded as being totally and partially breastfed at 6-8 wks in Newham as a % of those who were due a Review by the end of the period.



	2017/18	2018/19 Year to date	Direction of Travel
Actual	22.80%	21.77%	Quarter On Quarter
Target	96.00%	96.00%	
Quarter 1			
	Same Period, Last Year	Latest Period	Target Met
	2017/18	2018/19	
Actual	27.93%	21.77%	N
Target	96.00%	96.00%	
Comparator			
Not yet available			

Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4	YTD
2018/19 Actuals	21.77%				21.77%
No. recorded as breastfed	303				303
Total no. of infants	1392				1392
2017/18 Actuals	27.93%	25.80%	20.45%	16.71%	22.80%
Numerator	395	402	301	233	1,331
De-nominator	1414	1558	1472	1394	5838

**Comments**

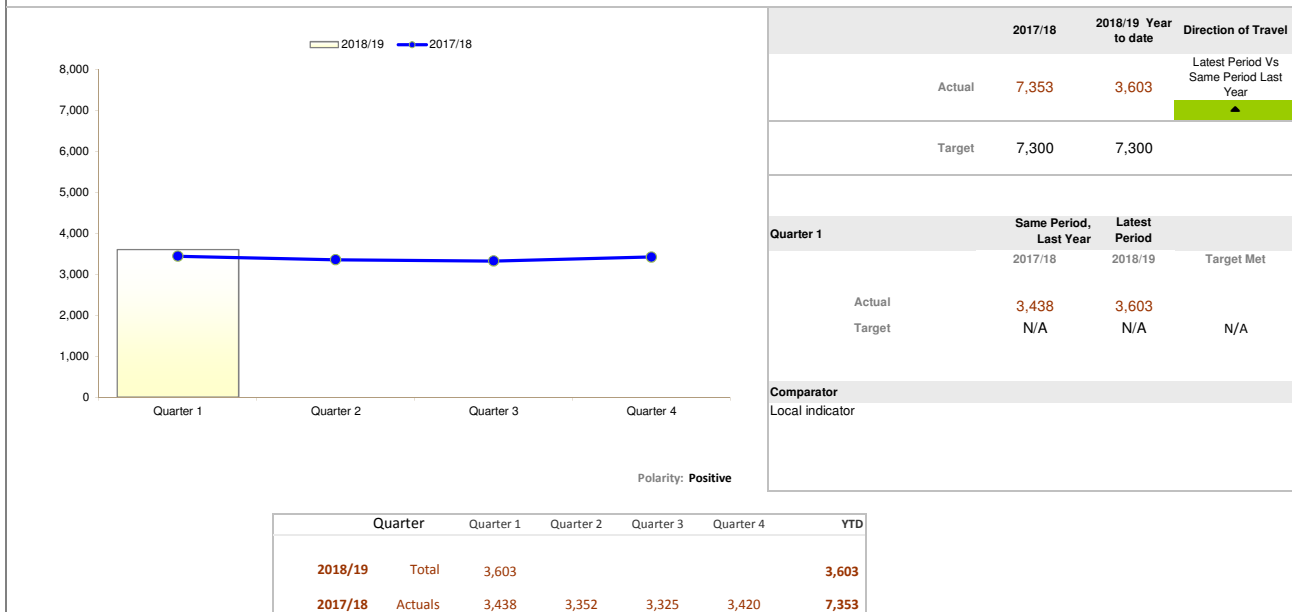
Data is currently being validated with the East London Foundation Trust who manage the RIO IT system. Alternative reporting process is in place for management oversight of this data.

The denominator used is that of all children due a 6-8week check rather than just those who chose to take up the 6-8 week check (as not all parents do). This means the reported % may be artificially low as mothers may breastfeed and not have taken up the 6-8 week check, so their status is unknown. The target reflects a % of those who choose to take up the 6-8 week check.

UNICEF Baby Friendly training is being rolled out for Best Start in Life staff to support improving the breastfeeding rate. Training is also offered through the Early Start CPD training offer for BSIL staff.

### CBS5.9 Number of unique users 0-5 attending stay and play sessions

Number of unique users 0-5 attending stay and play sessions (unique to quarter and unique in the year to date)



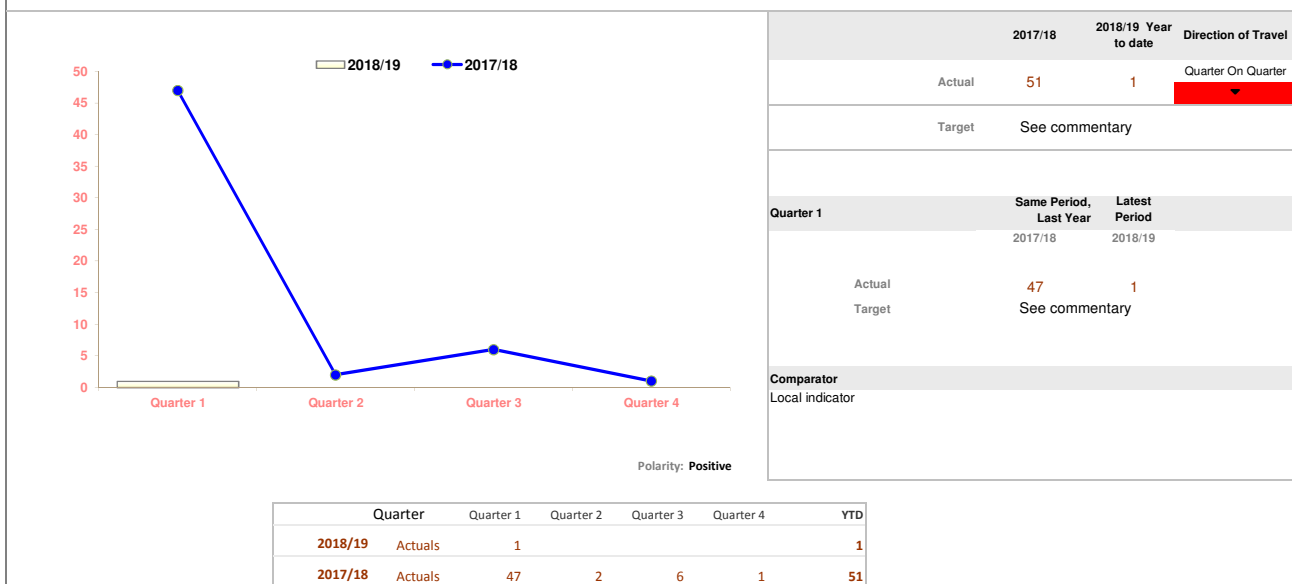
#### Comments

There were 3,603 unique children aged 0-4 that attended Stay and Play sessions in Quarter 1 18/19. Work has been undertaken to increase the number of Stay and Play sessions on offer as they are the core source of turning families away from provision. The target for this PI has been set at 75% of unique contacts, this is as not every family who attends a Health Clinic at a Children's Centre will necessarily wish to take up the offer of Stay&Play sessions, the aim is to have the majority of registered families attend at least one session.

Stay and Play sessions include a range of activities including baby singalong, messy play, music and movement, parent and toddler and singing and craft. Note some sessions in the Stay and Play category are also included in other categories e.g. parenting. Attendance will therefore also be counted within that category. Note only an annual target is set for this indicator.

### CBS7 Number of referrals to Workplace from Children's Centres

Number of referrals to Workplace from Children's Centres

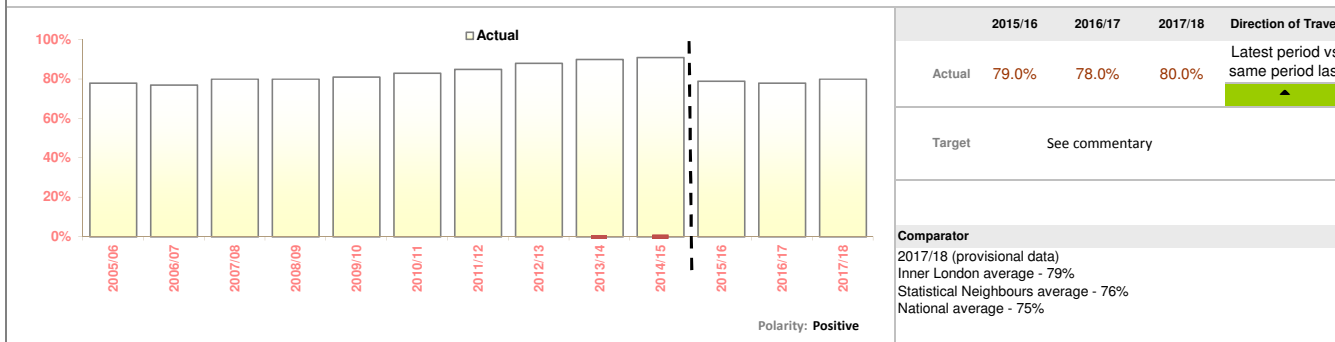


#### Comments

Workplace has assigned engagement officers to each Best Start in Life Provider in order to encourage parents seeking employment to sign-up with Workplace. The engagement team have agreed to attend BSIL sessions and Children's Centre activities/events to share vacancy and training lists with parents seeking training and employment. Quarter 1 data is currently being validated. A target is not being set while the data is validated.



## Key stage 1: Percentage of pupils achieving the (new) expected standards in reading



## Comments

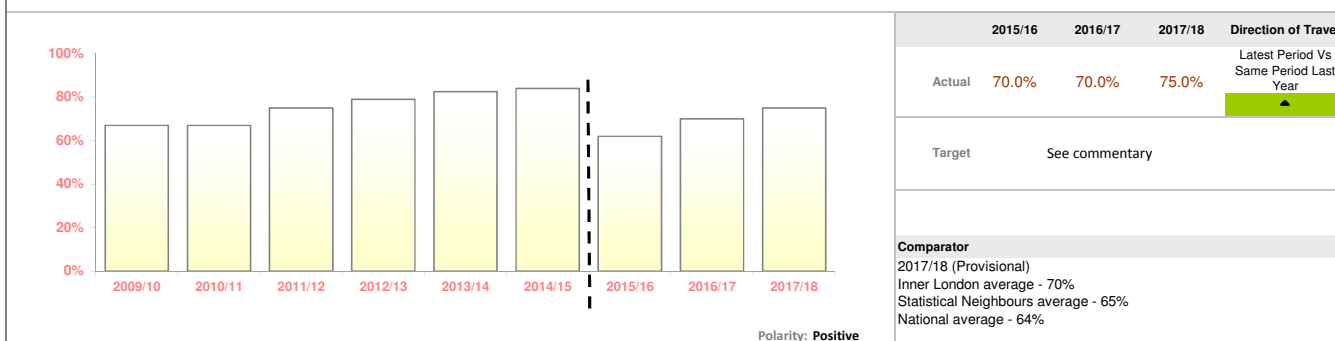
NOTE: Children at key stage 1 in 2015/16 were the first to be taught and assessed under the new national curriculum, and the expected standard for attainment has been raised. These changes mean that the expected standard this year is higher and not comparable with the expected standard used in previous year's statistics. It would therefore be incorrect and misleading to make direct comparisons showing changes over time, although historical data showing the previous measure has been retained for reference.

8 in every 10 pupils (80%) achieved the expected level for reading at Key Stage 1, ahead of the national figure of 75%. Newham was ranked 34th nationally in 2017 for this measure and 12th in 2018.

On the (separate) combined measure of the percentage of pupils achieving the expected standard in all of reading, writing and mathematics, 73% of Newham pupils were successful, compared to the national figure of 65% - eight percentage points higher.

Hard numerical targets are not currently set for attainment related PIs given the current nature of the LA's relationship and influence with schools. This approach will be reviewed with the appointment of a new Director of Ed and Skills and evaluation of the LA's relationship with schools.

## Key stage 2: Percentage of pupils achieving the (new) expected standard in all of reading, writing and mathematics



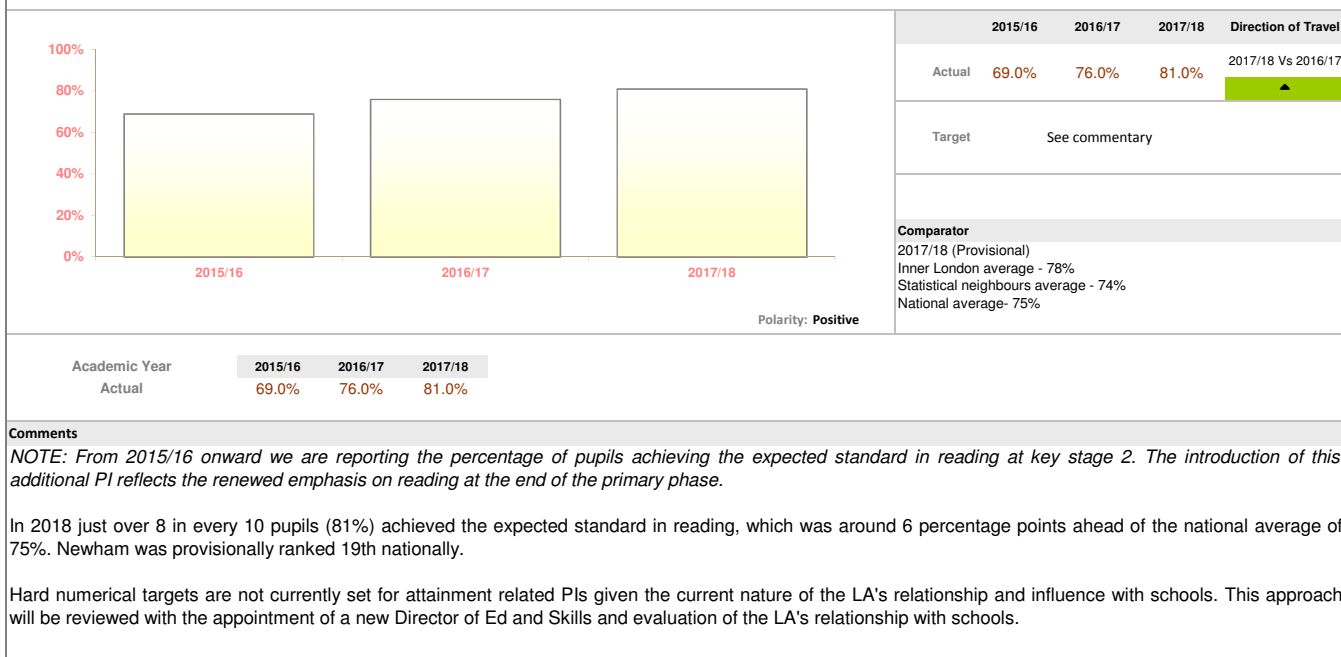
## Comments

NOTE: Children sitting key stage 2 tests in 2016 were the first to be taught and assessed under the new national curriculum. The expected standard has been raised and the new accountability framework for schools has also changed. These changes mean that the expected standard this year is higher and not comparable with the expected standard used in previous year's statistics. It would therefore be incorrect and misleading to make direct comparisons showing changes over time.

In 2018 approximately 3 in every 4 pupils (75%) achieved the expected level for all of reading, writing and mathematics at key stage 2 - ahead of the national level of 64%. Newham was ranked 11th nationally in 2017 and 7th in 2018 based on these provisional results.

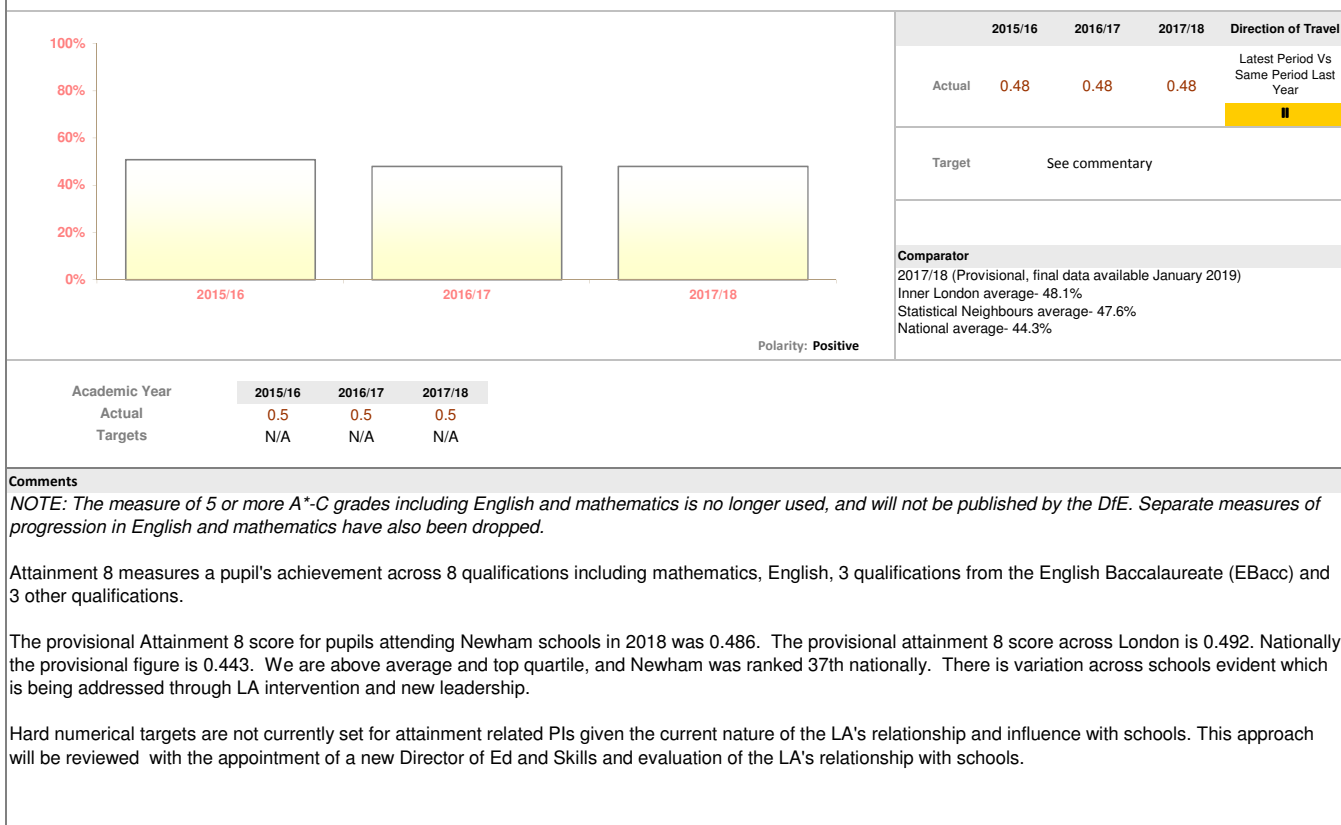
Hard numerical targets are not currently set for attainment related PIs given the current nature of the LA's relationship and influence with schools. This approach will be reviewed with the appointment of a new Director of Ed and Skills and evaluation of the LA's relationship with schools.

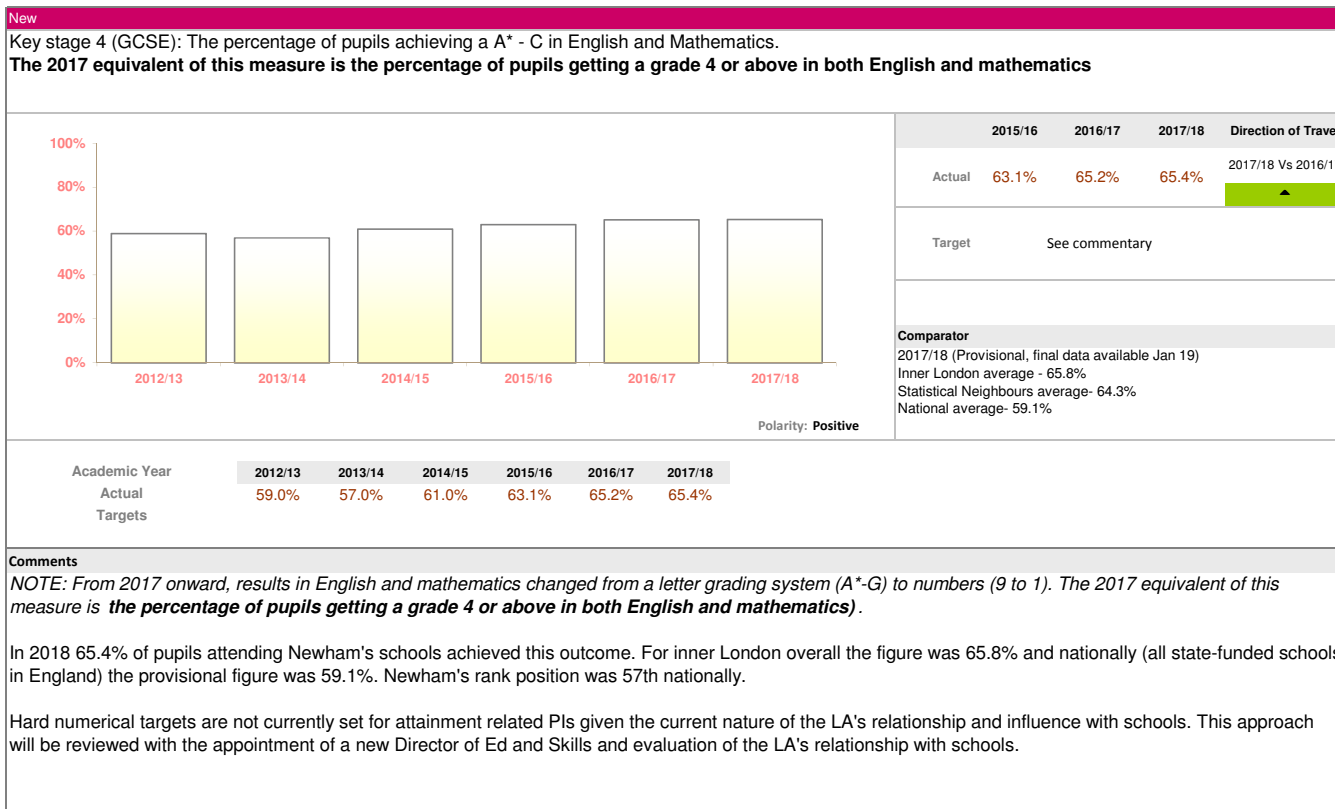
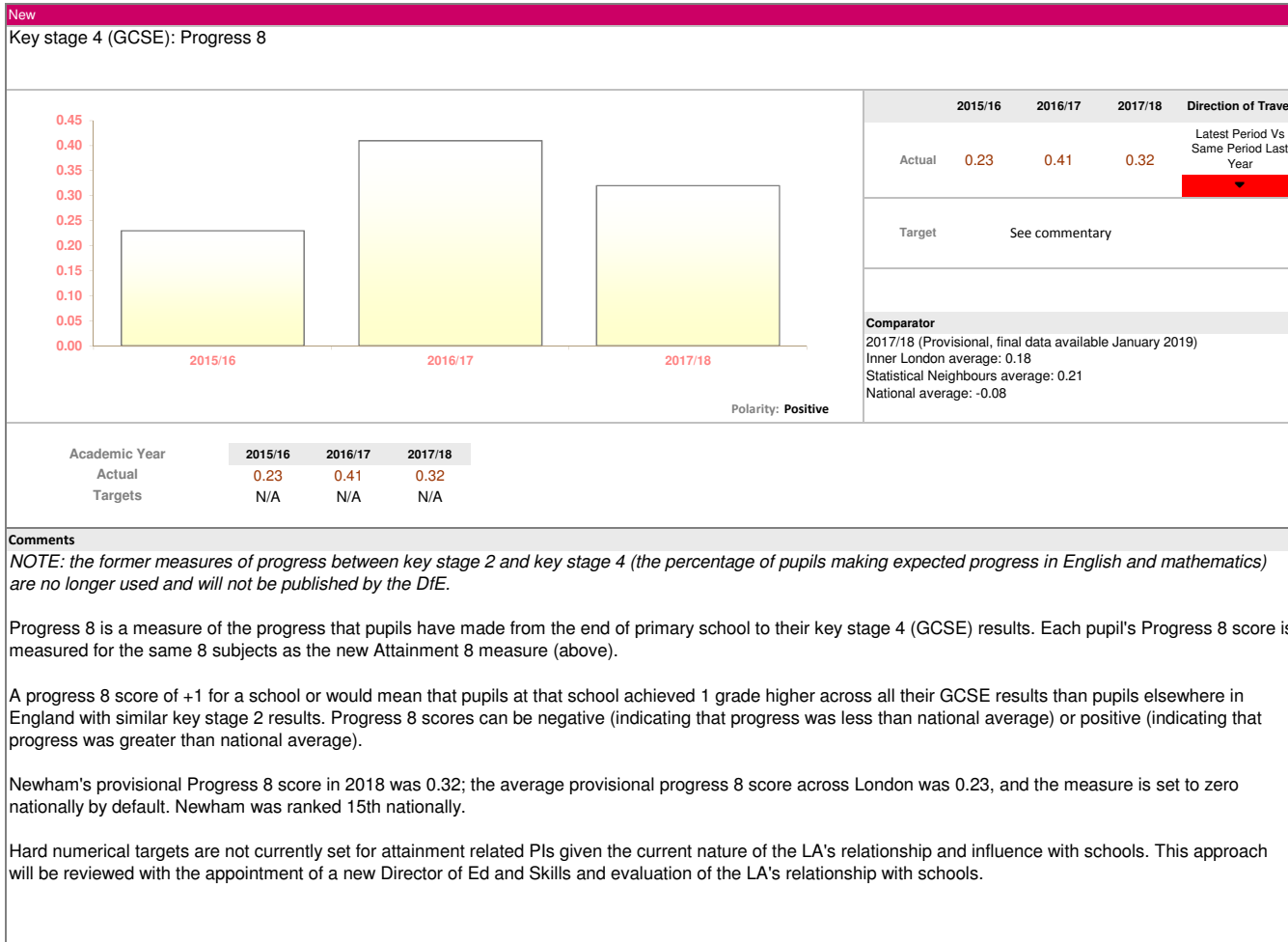
## Key stage 2: Percentage of pupils achieving expected level in reading



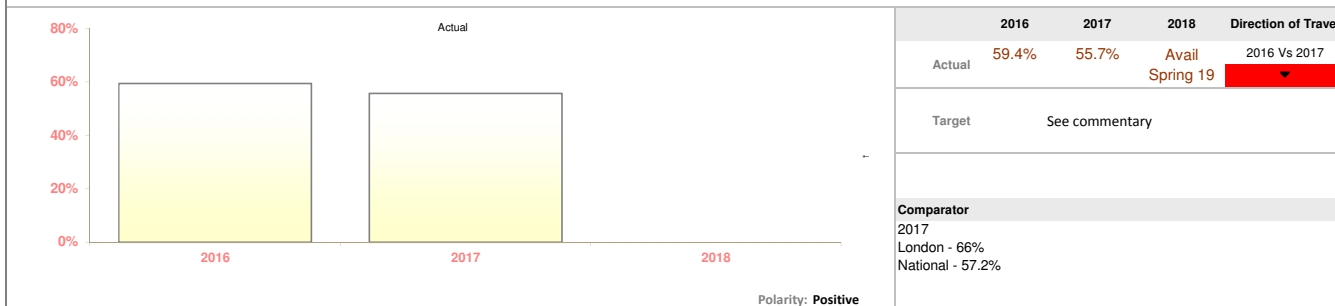
## PAPa1

## Key stage 4 (GCSE): Attainment 8





### NVQ Levels 3 (A Level equivalent) (ONS)



#### Comments

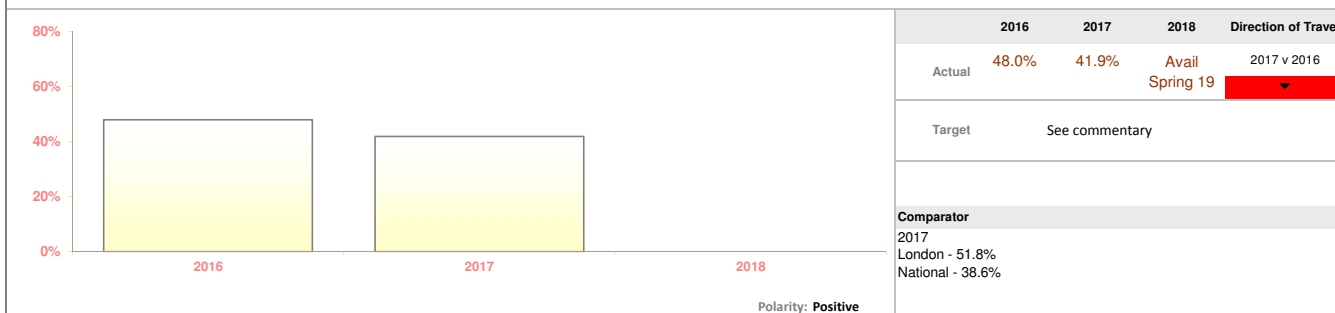
The proportion of Newham residents with qualifications at NVQ level 3 or higher decreased in 2017 compared with the previous year. Performance is approximately 10% points lower than the London average and 1.5% points below the national average.

Data is published for the calendar year. NVQ 3 equivalent: 2 or more A levels, advanced GNVQ, NVQ 3, 2 or more higher or advanced higher national qualifications (Scotland) or equivalent. Note this indicator is in relation to the whole resident population aged 16-64 rather than students at Newham colleges. Data for 2018 will be published in Spring 2019.

The Annual Population Survey (APS) is a combined survey of households in Great Britain. Its purpose is to provide information on key social and socioeconomic variables between the 10-yearly censuses, with particular emphasis on providing information relating to sub-regional (local authority) areas.

This PI relates to residents, not young people attending Newham schools. Therefore it is not currently appropriate to set a LA target. In the future it is proposed that this PI is viewed in relation to the broader impact of regeneration in Newham rather than schooling alone.

### NVQ Levels 4 (degree level equivalent) (ONS Annual Population Survey)



#### Comments

The proportion of Newham residents with qualifications at NVQ level 4 or higher decreased in 2017 compared with the previous year. Performance is 9.9% points below London, but over 10% points better than the national average.

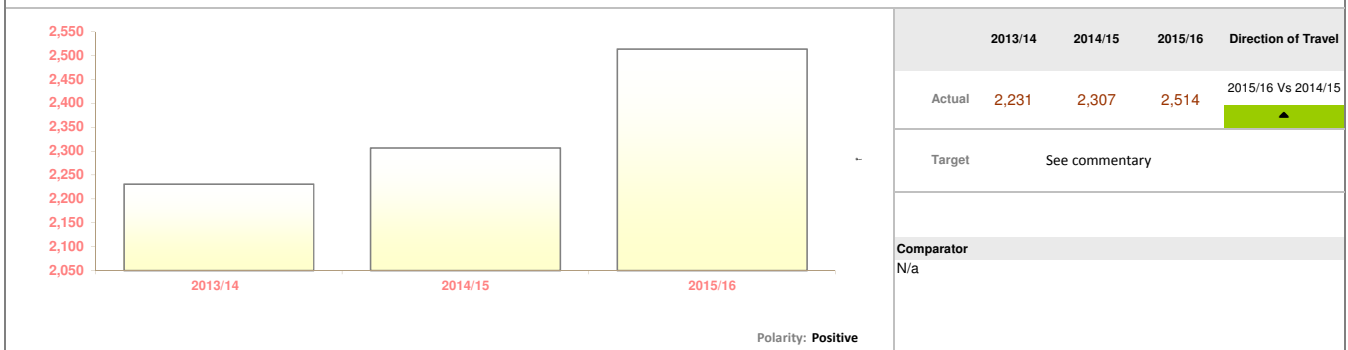
Data is published for the calendar year. NVQ 4 equivalent: HND, Degree and Higher Degree level qualifications or equivalent. Please note this indicator is in relation to the whole resident population aged 16-64 rather than students at Newham colleges. Data for 2018 will be published in Spring 2019.

The Annual Population Survey (APS) is a combined survey of households in Great Britain. Its purpose is to provide information on key social and socioeconomic variables between the 10-yearly censuses, with particular emphasis on providing information relating to sub-regional (local authority) areas.

This PI relates to residents, not young people attending Newham schools. Therefore it is not currently appropriate to set a LA target. In the future it is proposed that this PI is viewed in relation to the broader impact of regeneration in Newham rather than schooling alone.

Newham residents to University - this includes data for Newham residents aged 18-20 entering their first year of higher education study at a UK university on full-time first or undergraduate degrees (in arrears)

(Higher Education Statistics Agency)



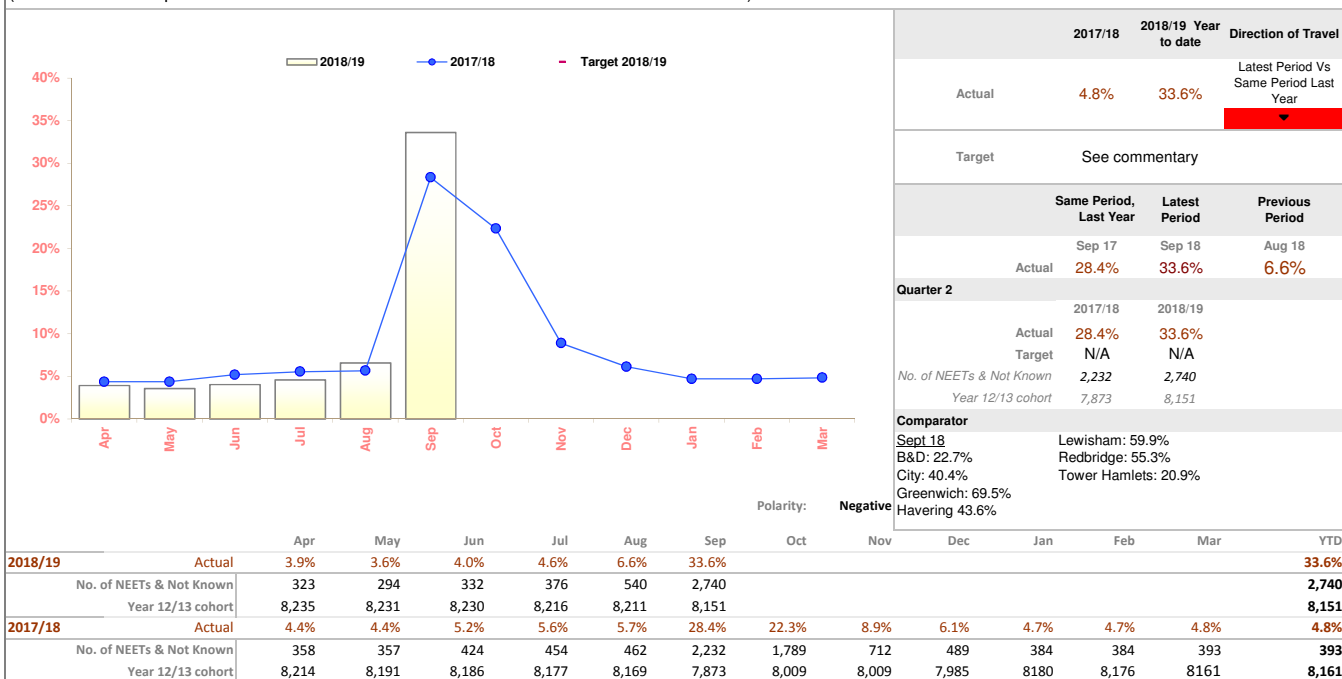
#### Comments

15/16 data became available in July 2017. The current analysis represents the fourth year of data since the increase of higher education tuition fees to a maximum of £9,000 per year in 2012/13. After a dip in numbers in 2012/13, the number of Newham residents aged 18-20 progressing to higher education on a first or undergraduate degree began to recover and increase year on year. In 2015/16, 2,514 young Newham residents progressed to higher education compared to 2,307 in the previous year. This represents an increase of 8.9% points. The number of 21-24 year olds has also increased to 576 from 550 the previous year.

**16/17 data will be available in Autumn 2018**, following Higher Education research Newham undertakes with UEL and London Councils in September.

This PI relates to residents, not young people attending Newham schools. Therefore it is not been seen as appropriate to set a LA target, however this approach will be reviewed.

Young people not in education, employment or training or destination not known combined (school year 12-13 residents)  
 Numerator = Number of age band 16-17 (as at 31/8) Not In Education Employment or Training (NEET) and number not known.  
 Denominator = Year 12/13 cohort  
 (This indicator is reported one month in arrears due to the date 15 Billion releases the data)



At the end of September 18, the outturn is 33.6%. However note this is reflective of the annual period of skewed data in Sept/Oct 2016, 2017 and now 2018 - the data within this period is skewed because it takes some time to track all of the education destinations of young people aged 16 & 17 at the start of the new academic year. They are transition months in which young people change status often moving from the 'in learning' cohort into the unknown category, which artificially impacts on the figures. Unknowns come down quickly as the school lists are received and processed early in the academic year (usually undertaken by careers companies). The 'in learning' category therefore rises again. This trend is always present.

Changes from 1 Sept 16 reduced the amount of information that LAs must collect and load in their Client Caseload Management Systems and submit to the DfE monthly. LAs are only required to submit data for young people aged 16 and 17 and are no longer required to collect information on young people beyond the end of the academic year they reach their 18th birthday. As a result a new headline measure has been developed which combines NEET and not known figures for 16 and 17 year olds (defined below). This gives a more accurate picture of LA performance in tracking and support for young people and means that low NEET levels can no longer be masked by high levels of 'unknowns'. The Source of the data remains 15 Billion.

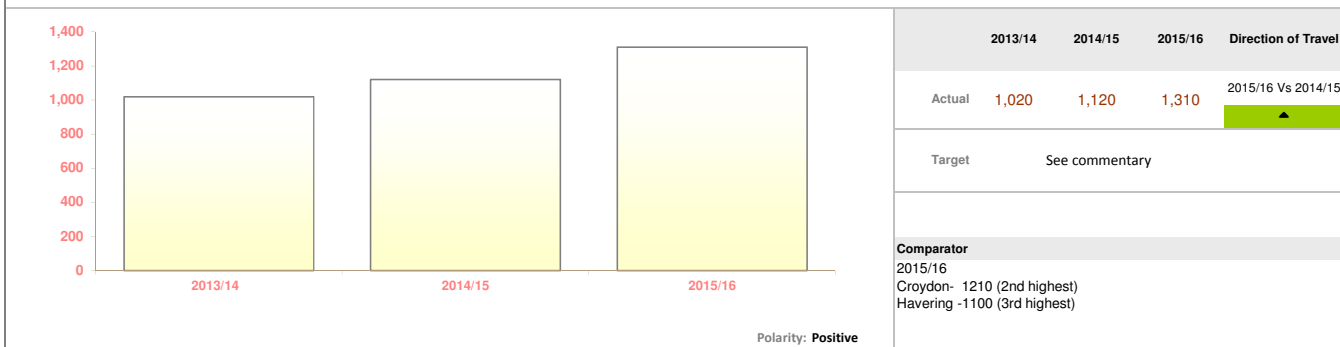
**Definition NEET:** this group of young people will currently not be recorded in any form of education, employment or training. Their activities will be defined by their individual circumstances and the types of barriers which may prevent them participating in learning. The cohorts are based on Non Adjusted totals within academic age 16 to 17 (academic years 12 and 13). This group will include both 'available' and 'non available' NEET activities e.g. Seeking education, employment & training; Supporting Family (Teenage Parent); Religious grounds; Have a confirmed start date for a participating/non participating activity; Supporting Family (Young Carer); Never economically active; Voluntary work without part time study; Illness; Other reasons; Those not yet ready for work or learning; Pregnancy.  
**Definition Not Known:** This group of young people have either a current 'unknown' destination recorded on their record, where there is no further information from reliable sources on their current situation, are within lapsed activities which have exceeded their currency period, or are unwilling to share any information on their current activity e.g. Expired or lapsed activities (Excluding NEET); Transitional Year 11 & Post 16 Learning; Current Situation Unknown; Refused to provide information; Cannot be contacted; Learning Early Leavers.

The data is based on Newham's monthly National Client Caseload Management Information System (NCCIS) submission to the DfE. It is based on the young person's destination at the end of the month. The cohort does not include refugees or those in custody. Newham's Statistical Neighbour Grouping consists of Brent, Waltham Forest, Barking and Dagenham, Greenwich, Haringey, Hackney, Ealing, Birmingham, Slough and Enfield.

Historically a target has not been set for this PI due to it's calculation and breadth of factors influencing the outturn, not necessarily in the LAs influence. The appropriateness of setting a target for this PI will be reviewed in the latter half of 18/19.

## Apprenticeship Completions (Newham residents all ages)

- Published by Skills Funding Agency in June each year.



### Comments

In 2015/16, 1,310 Newham Residents (all ages) completed Apprenticeships. This is a 17% increase on the previous year, compared to London (+7.6%) and England (+4.1%). Newham has the highest number of Apprenticeship completions of any London borough, so more Newham residents completed apprenticeships than anywhere else in London. This is particularly significant, as Newham had higher apprenticeship completions than boroughs with larger population sizes such as Croydon, Barnet, Ealing and Enfield. Newham had 1,310 completions compared to the next highest - Croydon with 1,210, followed by Havering with 1,100.

Apprenticeships are employer-led and recruited, so Newham Council's role is limited to influencing employers to take on more apprentices; highlighting apprenticeship opportunities to local residents; and supporting them to apply for apprenticeship places. The Council also has its own Apprenticeship Scheme which employs local residents on Apprenticeships with the Council. 2,470 Newham residents *started* Apprenticeships in the full year 2015/16, which was the second highest of any London borough (Ealing 2,510). Apprenticeships vary in length, and all apprenticeships are over one year long so starts and completions are not comparable.

The Apprenticeship Levy that the Govt introduced in April 2017 will not influence the number of apprenticeship completions until late 2018, for which data will be published in Autumn 2019. The Apprenticeship Levy will influence the number of Apprenticeship starts from May 2017 onwards and 2018 data on starts will show the effect of the Levy on the number of residents starting Apprenticeships.

### 16/17 data will be published in Autumn 2018.

Historically a target has not been set for this PI given the Council's limited influence. As said above it is limited to influencing employers to take on more apprentices; highlighting apprenticeship opportunities to local residents; and supporting them to apply for apprenticeship places.

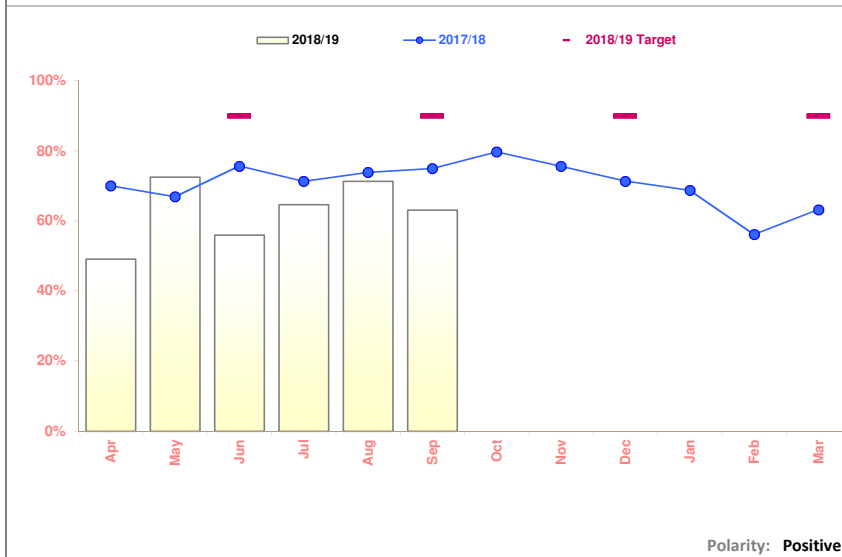
Percentage of single assessments for children's social care carried out within 45 working days of referral.

Numerator

Single Assessments completed in 45 working days in the month (Completed = authorised by a manager on Carefirst). Counted from point of referral.

Denominator

Number of Single Assessments completed in the month.



	2017/18	2018/19 Year to date	Direction of Travel
Actual	70.2%	62.2%	Year To Date Vs Last Year
Target	100.0%	90.0%	
	Same Period, Last Year	Latest Period	Previous Period
	Sep 17	Sep 18	Aug 18
Actual	75.0%	63.1%	71.3%
Quarter 2			
	2017/18	2018/19	Target Met
Actual	73.3%	66.8%	N
Target	100.0%	90.0%	
SAs in 45 days	1,012	734	
SAs completed	1,381	1,099	
Comparator			
2016/2017			
England Quartile = 4		England Average = 82.9%	
England Rank = 139/152		London Average = 82.3%	
London Quartile = 4		Statistical Neighbours	
London Rank = 31/33		Average = 81.4%	
Statistical Neighbours Rank = 10/11			

		Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19	Actual	49.1%	72.5%	56.0%	64.7%	71.3%	63.1%							62.2%
	SAs in 45 days	259	306	219	282	291	161							1,518
	SAs completed	527	422	391	436	408	255							2,439
2017/18	Actual	70.0%	66.9%	75.7%	71.3%	73.9%	75.0%	79.7%	75.6%	71.4%	68.7%	56.1%	63.2%	70.2%
	SAs in 45 days	147	368	320	361	354	297	232	130	132	211	229	227	3,008
	SAs completed	210	550	423	506	479	396	291	172	185	307	408	359	4,286

Comments

Current Situation: Timeliness of Single Assessments has decreased from 71.3% in August to 63.1% in September.

All assessment teams have worked to complete assessments before the launch of the integrated assessment service on 3rd September, this is reflected in the data. Senior Managers continue to embed 10 day management oversight, this ensures that the Practice Leads are aware of their work and assessments are being completed within the expected timeframe. There is expected to be an improvement in the timeliness in October. The integrated assessment service has been recently launched and will ensure consistency and that the appropriate thresholds are applied.



## Child Protection Plans - rate per 10,000 under 18s

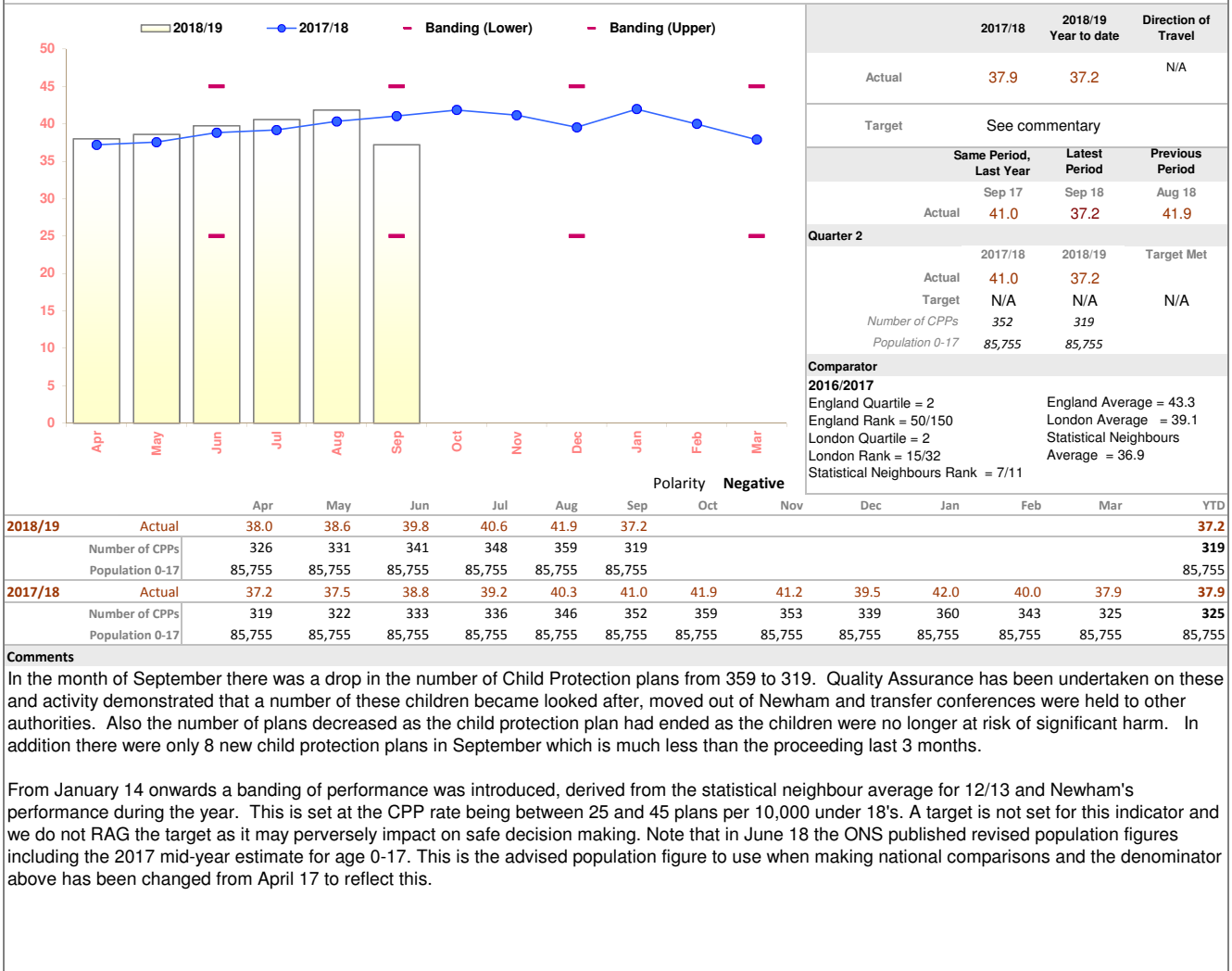
Snapshot indicator.

Numerator

No. of children on a child protection plan at a snapshot date

Denominator

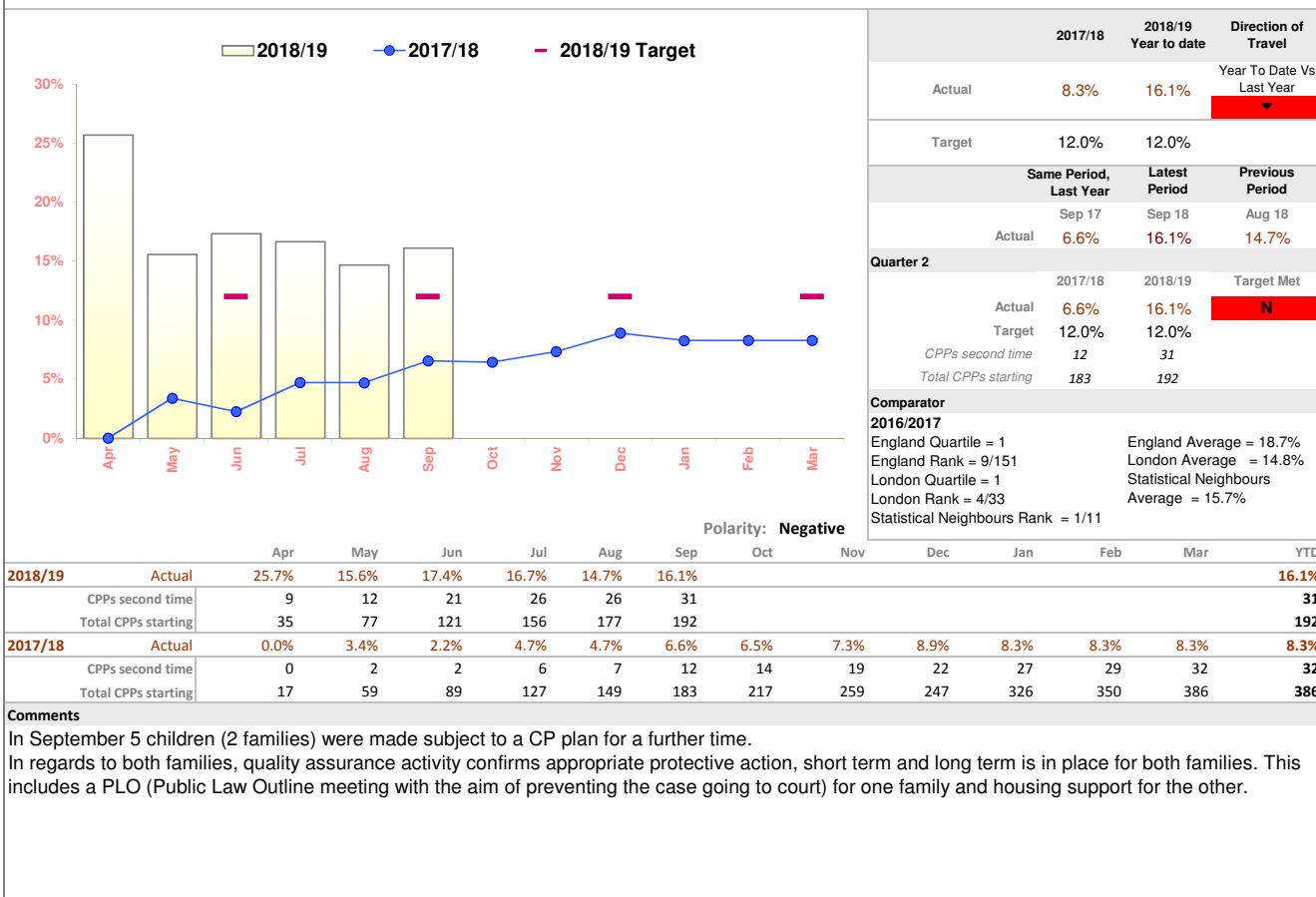
Population of Newham 0-17 (ONS mid year estimates)



The percentage of children becoming the subject of a child protection plan for a second or subsequent time.  
Cumulative indicator.

**Numerator** = number of children who became subject to a CPP during the year, who had previously been the subject of a CPP, or on the LBN Child Protection Register, regardless of how long ago that was.

**Denominator** = number of children who became subject to a CPP during the year.

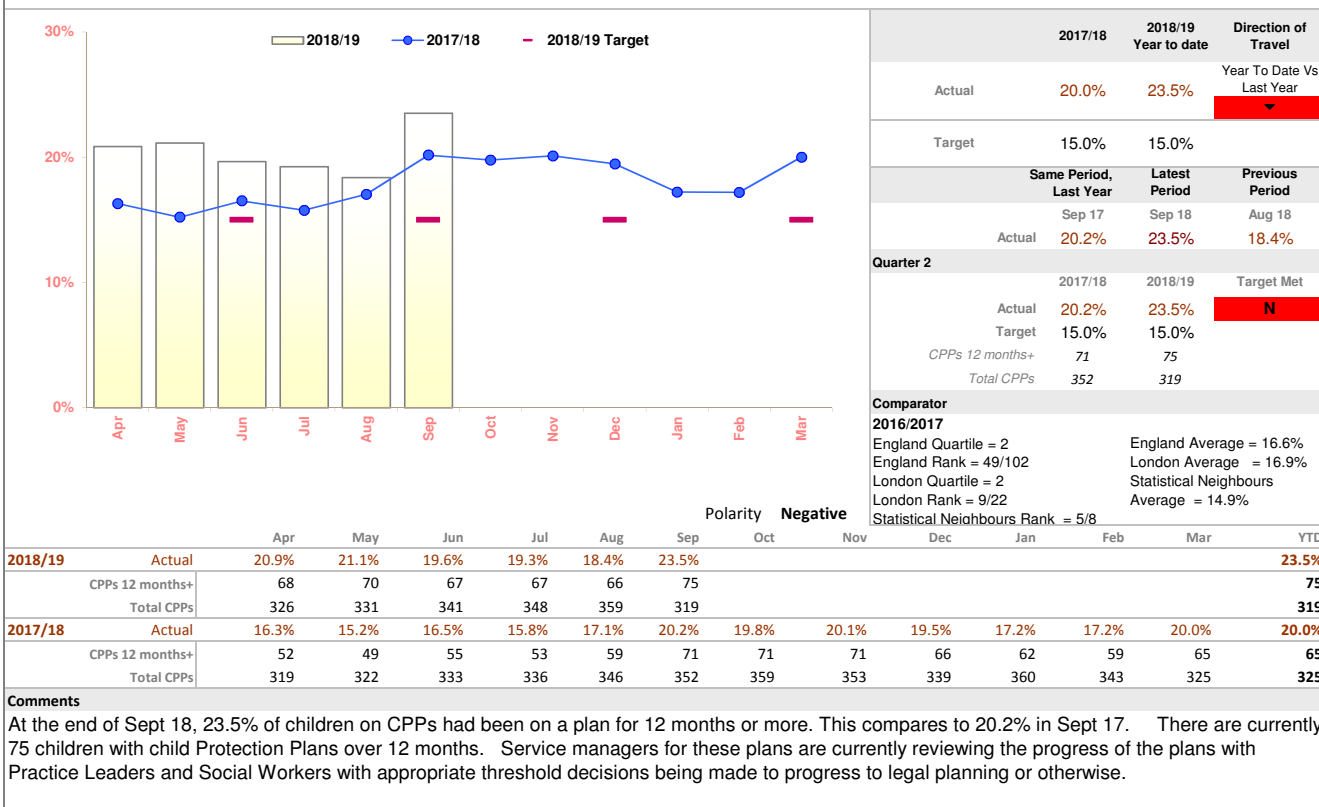


## PASo1.5 - 12 Month+

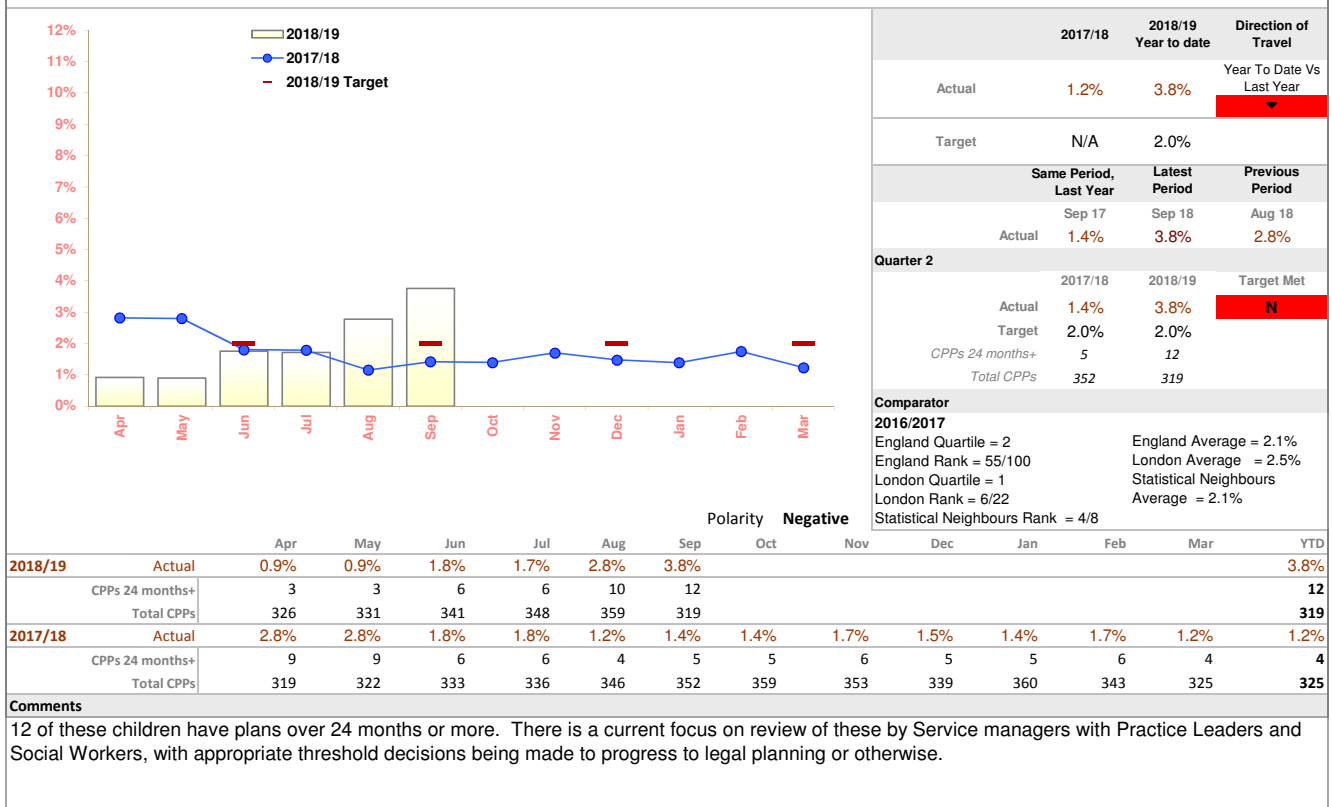
Child protection plans lasting 12 months or more

**Numerator** = number of children subject of a CPP continuously for 12 months or longer as of the snapshot date

**Denominator** = number of children subject of a CPP as of the snapshot date



Child protection plans lasting 24 months or more

Numerator = number of children subject of a CPP continuously for 24 months or longer as of the snapshot dateDenominator = number of children subject of a CPP as of the snapshot date

## Looked After Children - rate per 10,000 under 18s

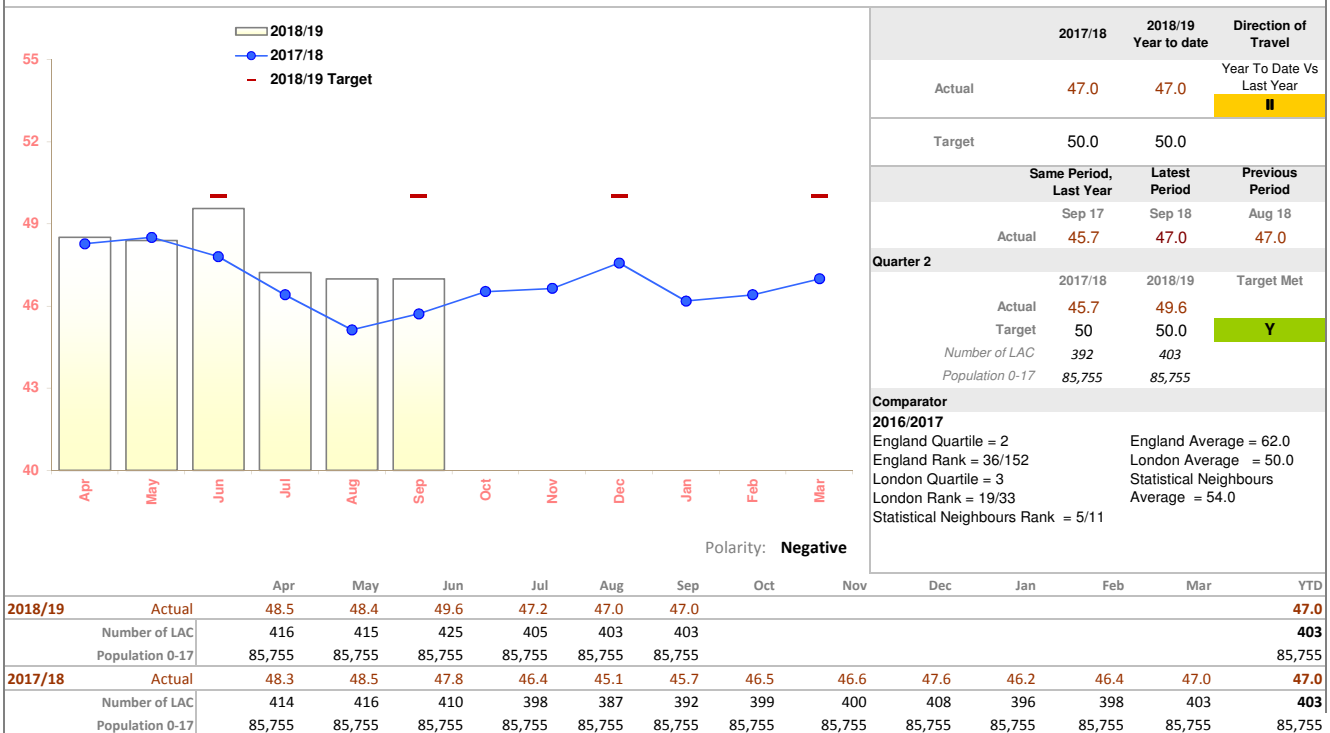
Snapshot indicator.

## Numerator

Number of looked after children at a snapshot date

## Denominator

0-17 population (ONS mid year estimate)



## Comments

After an increase seen in the first 3 months of this year LAC numbers have returned to there previous levels and are remaining stable, however this does not mean that this is the same 403 children in care. Whilst the LAC numbers may appear to be stable there is quite a high level of churn, which inevitably means workload pressures with new children coming into care due to the consequent assessment and support work that is required.

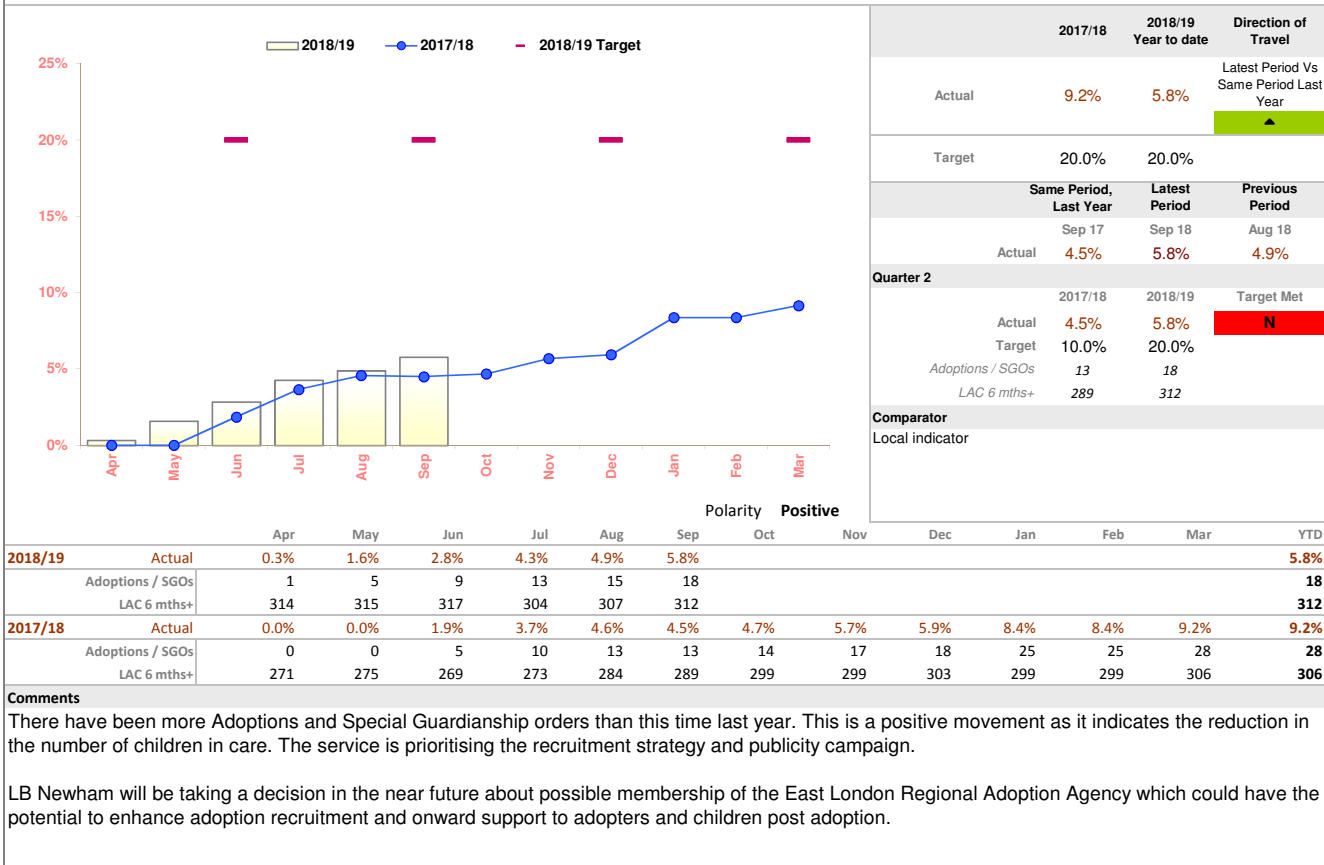
In September there were 13 new starters in, (from 12 separate families). Of those that ended in period, 3 were adopted, 5 ceased as they had become 18.

Note that in June 18 the ONS published revised population figures including the 2017 mid-year estimate for age 0-17. This is the advised population figure to use when making national comparisons.

Number of children adopted (adoptions of children looked after) and/or Special Guardianship Order  
Cumulative indicator.

Numerator = number of looked after children adopted or becoming subject of a Special Guardianship Order during the year

Denominator = number of children looked after at month end who had been looked after for six months or more on that day (excludes unaccompanied asylum-seeking cyp)

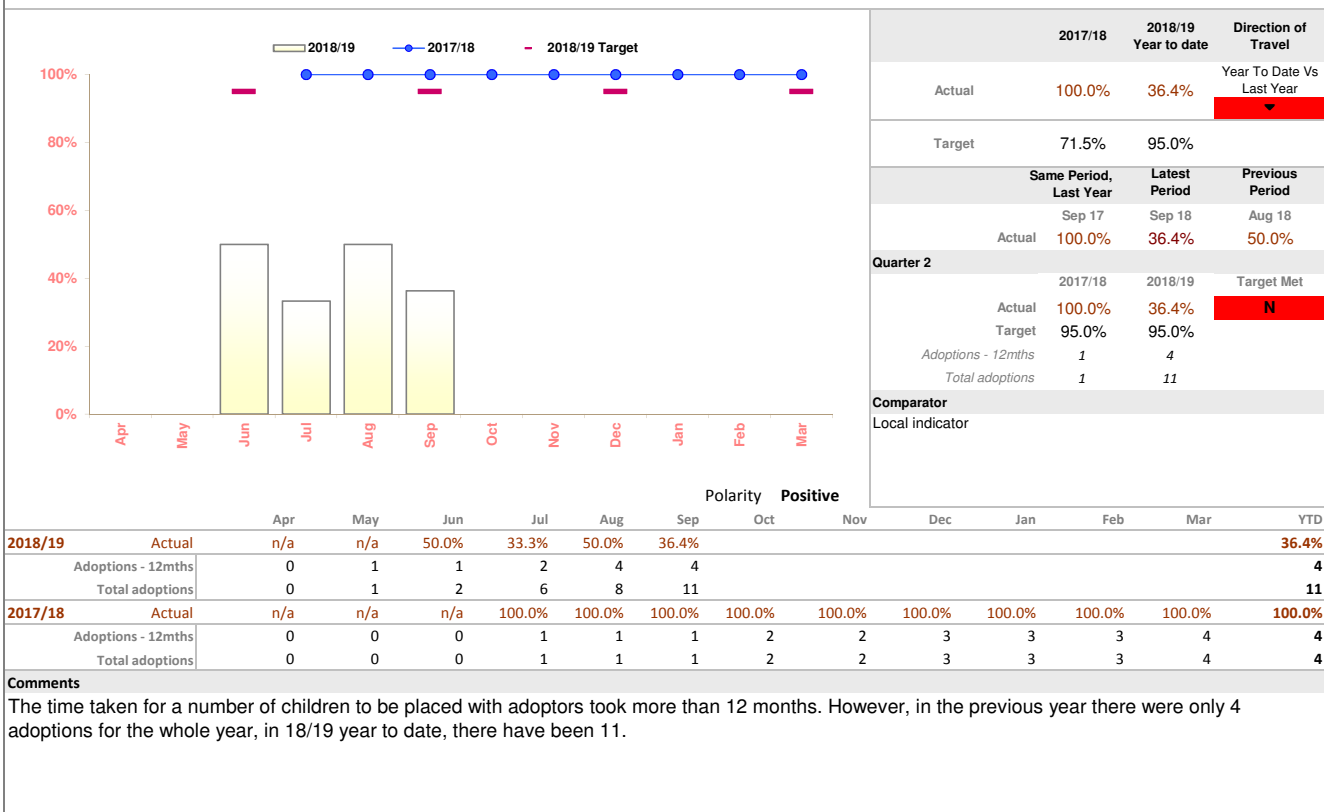


Timeliness of placements of Looked after children following an agency decision that the child should be placed for adoption

Cumulative indicator.

Numerator = number of children adopted during the year who were placed within 12 months of the decision that they should be placed for adoption, and who remained in that placement

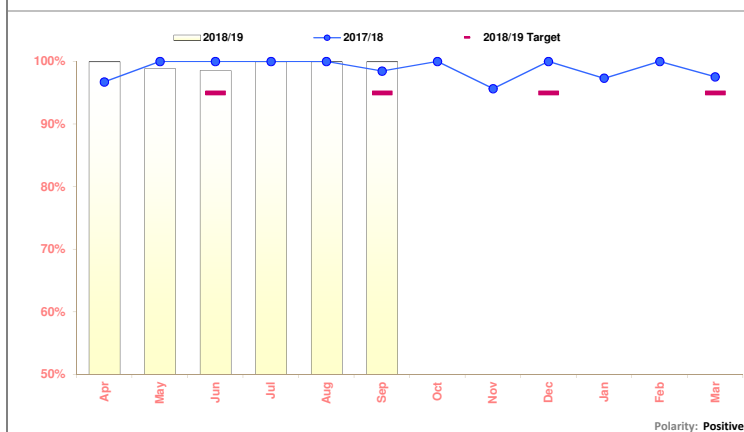
Denominator = number of children who were adopted (excludes Special Guardianship Orders)



## Participation of looked after children (aged 4+) in their most recent statutory review

**Numerator:** Number of LAC who participated in their review (where a review is due in the month i.e. 4 weeks, 3 mths, 6 mths)

**Denominator:** Number of reviews due of the LAC aged 4+ in the month



	2017/18	2018/19 Year to date	Direction of Travel
Actual	97.8%	99.7%	Year To Date Vs Last Year ▲
Target	95.0%	95.0%	
Same Period, Last Year			
	Sep 17	Sep 18	Previous Period Aug 18
Actual	98.5%	100.0%	100.0%
Quarter 2			
	2017/18	2018/19	Target Met
Actual	99.6%	100.0%	Y
Target	95.0%	95.0%	
Participated	224	227	
No. of reviews	225	227	
Comparator			
Local indicator			

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19 Actual	100.0%	98.9%	98.6%	100.0%	100.0%	100.0%							99.7%
Participated	110	89	70	85	80	54							371
No. of reviews	110	90	71	85	80	54							372
2017/18 Actual	96.7%	100.0%	100.0%	100.0%	100.0%	98.5%	100.0%	95.7%	100.0%	97.3%	100.0%	97.6%	97.8%
Participated	59	52	67	64	42	65	61	88	59	73	72	80	358
No. of reviews	61	52	67	64	42	66	61	92	59	75	72	82	366

## Comments

100% of participation at LAC reviews held in Sept 18 included the participation of the child or young person. 54 children had LAC Reviews, all participated either in person or by contributing their views in other ways who were over the age of 4 years. Note the Year To Date (YTD) figure will not equal the sum of all the monthly figures as it only includes the most recent review for the child.

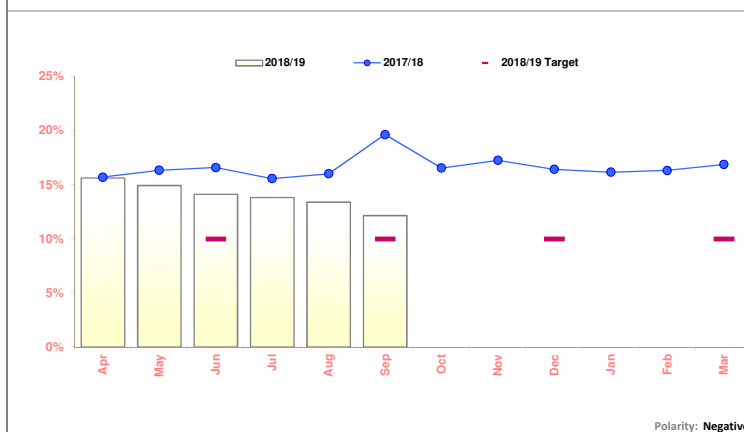
## NI62

## Stability of placements of Looked after children: 3 or more placements in 12 months

Snapshot indicator.

**Numerator** = number of LAC in denominator who had 3+ placements.

**Denominator** = number of LAC



	2017/18	2018/19 Year to date	Direction of Travel
Actual	16.9%	12.2%	Year To Date Vs Last Year ▲
Target	10.0%	10.0%	
Same Period, Last Year			
	Sep 17	Sep 18	Previous Period Aug 18
Actual	19.6%	12.2%	13.40%
Quarter 2			
	2017/18	2018/19	Target Met
Actual	19.6%	12.2%	N
Target	10.0%	10.0%	
LAC 3+ placements	77	49	
No. of LAC	392	403	
Comparator			
2016/17 (published by DfE Children's Services Analysis and Research team) England Average = 10% London Average = tbc			

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19 Actual	15.6%	14.9%	14.1%	13.8%	13.4%	12.2%							12.2%
LAC 3+ placements	65	62	60	56	54	49							49
No. of LAC	416	415	425	405	403	403							403
2017/18 Actual	15.7%	16.3%	16.6%	15.6%	16.0%	19.6%	16.5%	17.3%	16.4%	16.2%	16.3%	16.9%	16.9%
LAC 3+ placements	65	68	68	62	62	77	66	69	67	64	65	68	68
No. of LAC	414	416	410	398	387	392	399	400	408	396	398	403	403

## Comments

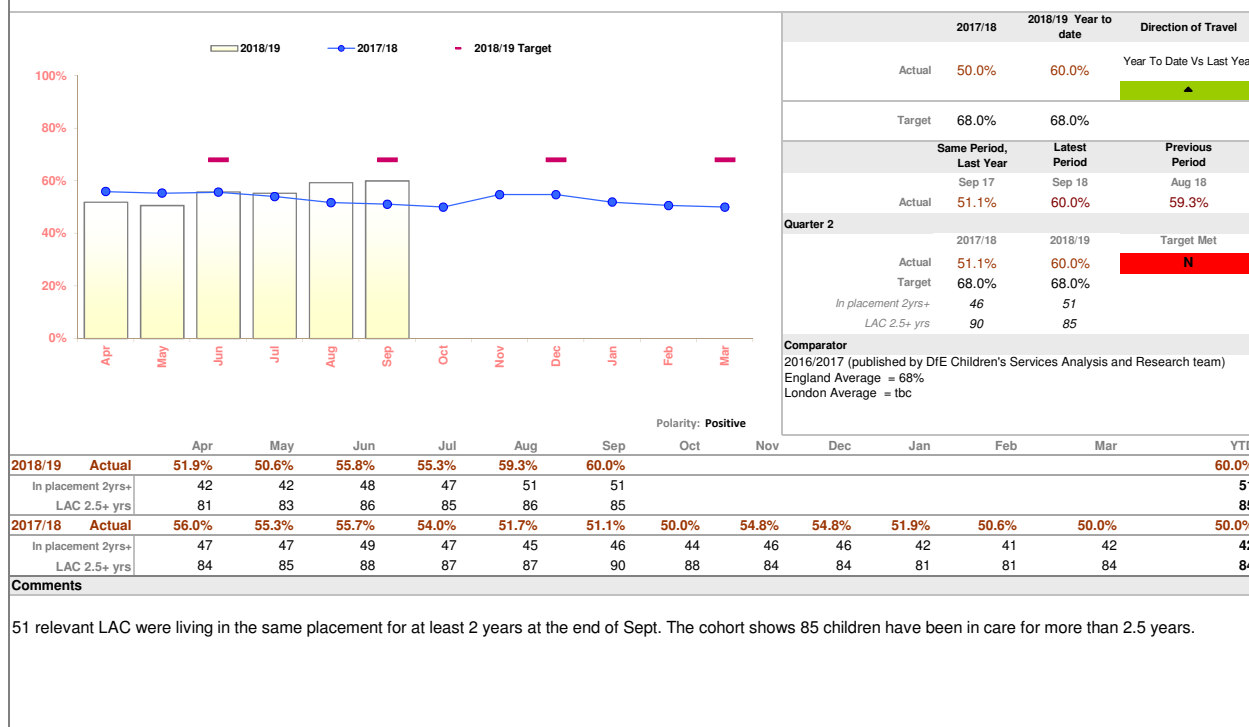
These figures relate to a report which is currently being rewritten and will be available for the November reporting period. This data is therefore not validated.

There is an alternative reporting process in place to support effective management oversight this activity. This process places this figure for LAC children experiencing 3 or more placements at 9.7% for Sept which is in line with the national average of 10%.

NOTE that 16/17 data is as was recorded on the Carefirst system and therefore does not include respite placements.

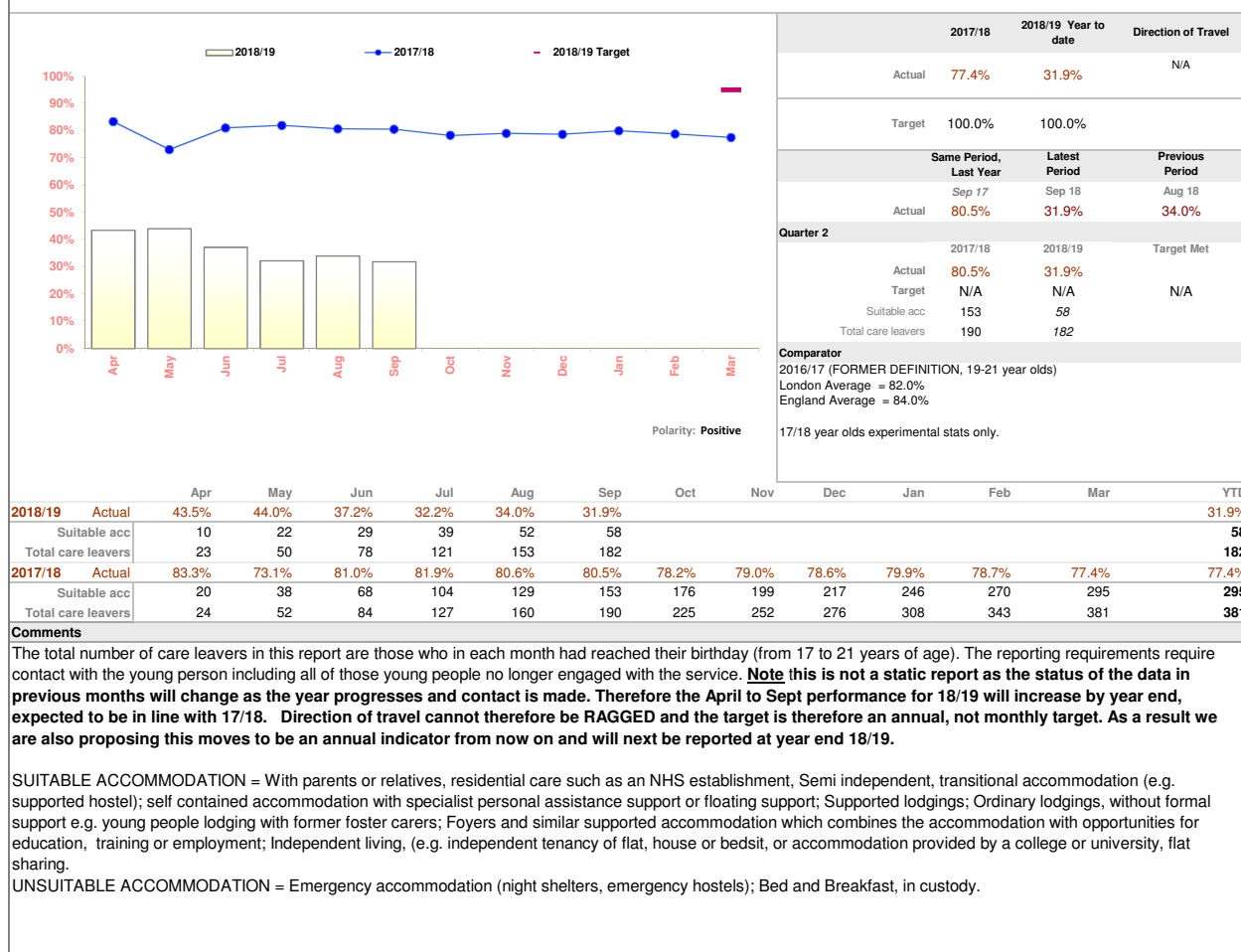
# Stability of placements of looked after children: length of placements.

Snapshot indicator - the percentage of looked after children under 16 who had been looked after continuously for at least 2.5 years in the reporting period (denominator) who were living in the same placement for at least 2 years, or are placed for adoption and their adoptive placement together with their previous placement together last for at least 2 years (numerator).



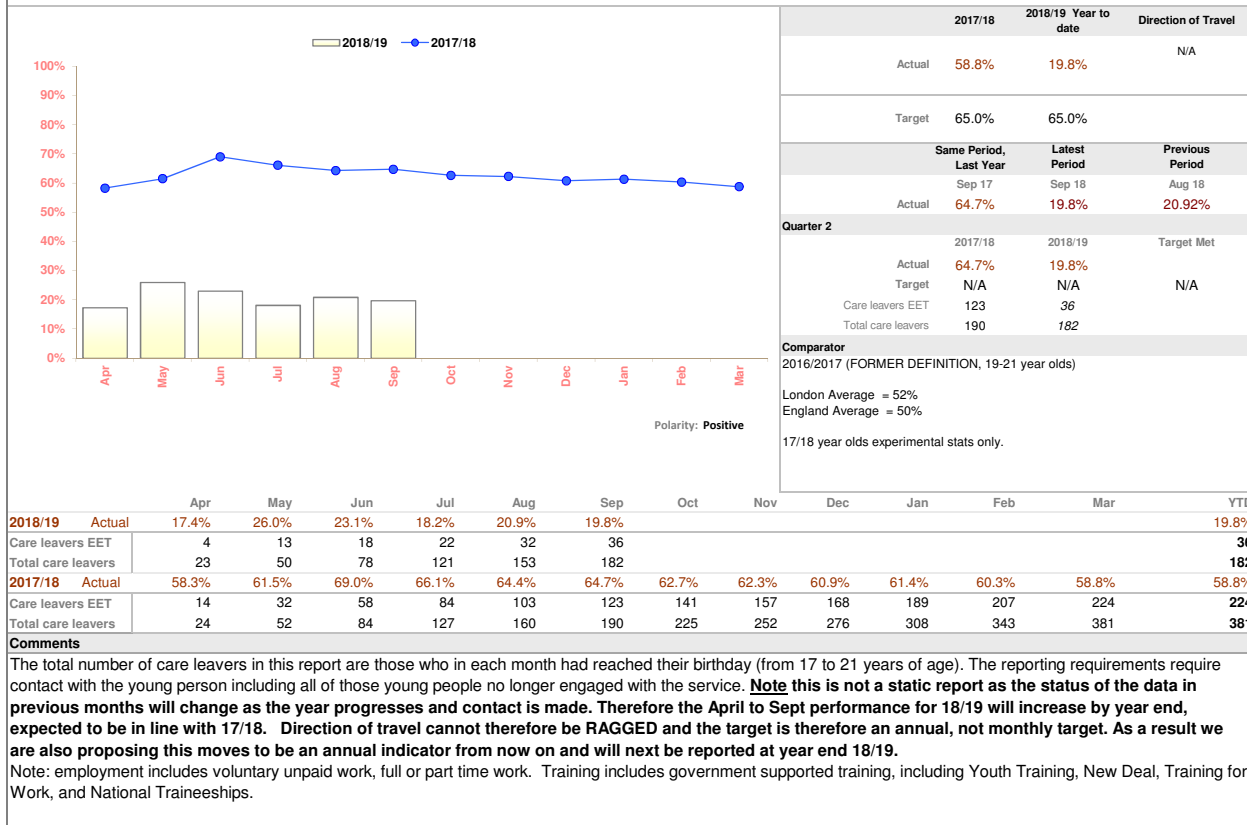
# Care leavers in suitable accommodation

Cumulative indicator based on specific group of young people. The percentage of former care leavers whose 17th, 18th, 19th, 20th or 21st birthday falls within the collection period.



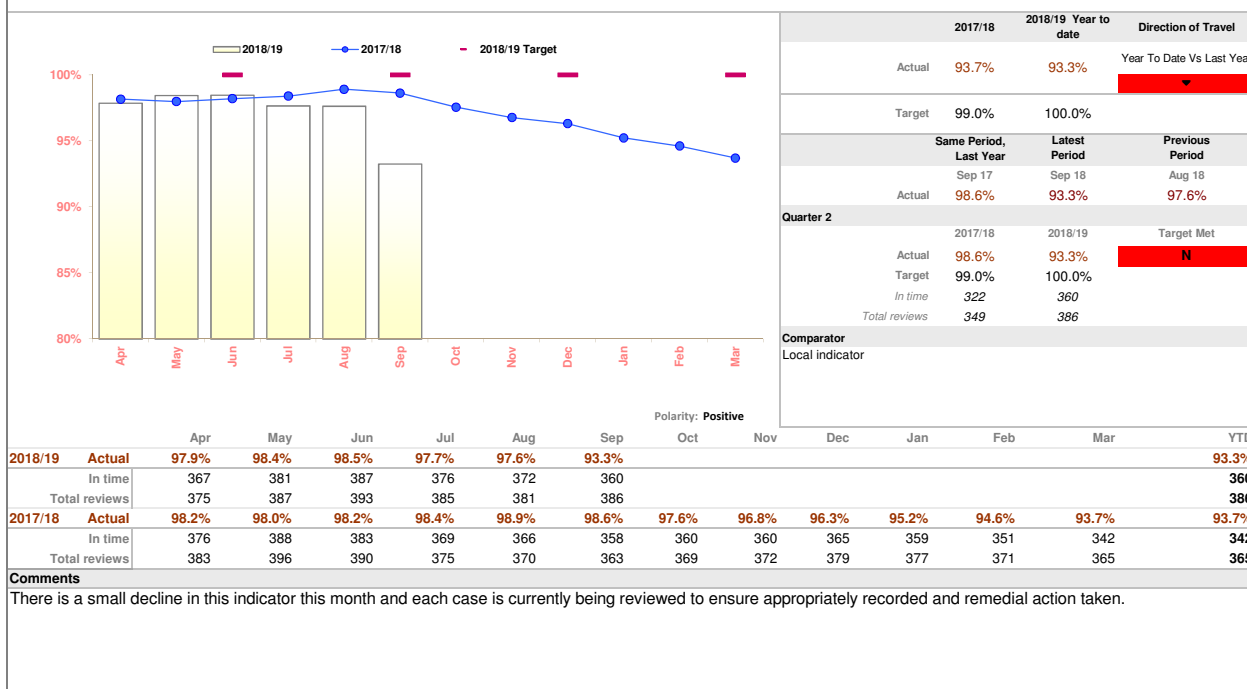
# Care leavers in employment, education or training

Cumulative indicator based on specific group of young people. The percentage of former care leavers whose 17th, 18th, 19th, 20th or 21st birthday falls within the collection period.



# Looked after children cases which were reviewed within required timescales

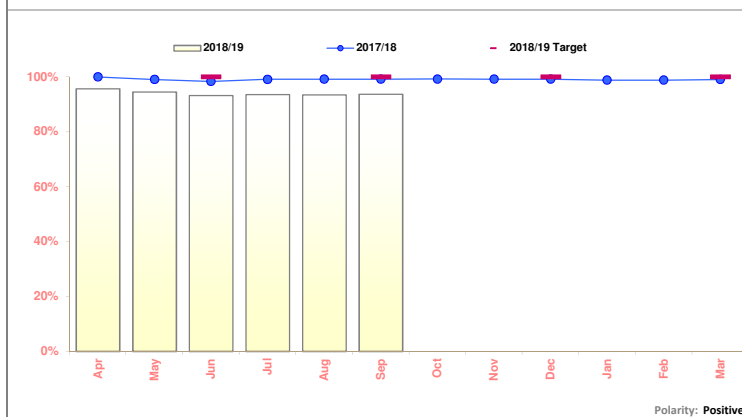
Snapshot indicator  
Timescales required are 4 weeks, 3 months, 6 months  
Denominator - looked after children requiring a review, open on the last date in the period (only includes cyp LAC for at least 4 weeks)





# The percentage of child protection cases which were reviewed within required timescales

Snapshot indicator - Numerator counts the number of children whose cases had been reviewed so that: the first review of the year was held within 6 months of the last review in the previous year (or within 3 months of the child being placed on the Register, if there was no review in the previous year).  
Denominator: the number of children with a Child Protection Plan who had a Plan continuously for at least the previous three months



	2017/18	2018/19 Year to date	Direction of Travel
Actual	99.1%	93.8%	Year To Date Vs Last Year
Target	100.0%	100.0%	
Same Period, Last Year			Previous Period
Sep 17	99.2%	Sep 18	Aug 18
Actual	99.2%	93.8%	93.5%
Quarter 2	2017/18	2018/19	Target Met
Actual	100.0%	93.8%	N
Target	100.0%	100.0%	
In time	263	240	
CYP plan 3 mths+	263	256	
Comparator			
2016/2017			
England Quartile = 1	England Average = 92.2%		
England Rank = 34/150	London Average = 95.7%		
London Quartile = 2	Statistical Neighbours Average = 95.0%		
London Rank = 10/31	Statistical Neighbours Rank = 3/10		

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19 Actual	95.7%	94.5%	93.3%	93.6%	93.5%	93.8%							93.8%
In time	222	208	208	219	244	240							240
CYP plan 3 mths+	232	220	223	234	261	256							256
2017/18 Actual	100.0%	99.1%	98.4%	99.2%	99.2%	99.2%	99.3%	99.2%	99.2%	98.8%	98.8%	99.1%	99.1%
In time	237	229	241	235	254	262	271	243	248	254	255	219	219
CYP plan 3 mths+	237	231	245	237	256	264	273	245	250	257	258	221	221

## Comments

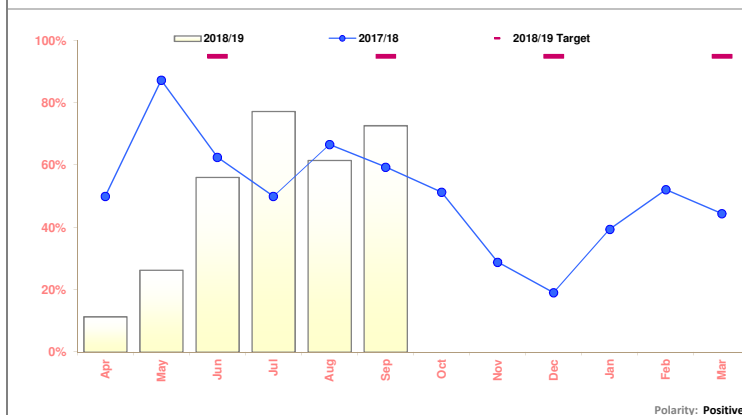
At the end of Sept 93.8% of CP cases were reviewed within timescale which is a very slight increase from August 2018.

## Initial CP Conferences

Initial child protection conferences held within 15 days of the start of the section 47 enquiries which led to a conference

Numerator  
Of those in the denominator the no. of ICPCs held within 15 working days of the start of the S47 Enquiry.

Denominator  
Number of ICPCs held in the month



	2017/18	2018/19 Year to date	Direction of Travel
Actual	50.9%	46.0%	Year To Date Vs Last Year
Target	85.0%	95.0%	
Same Period, Last Year			Previous Period
Sep 17	59.4%	Sep 18	Aug 18
Actual	59.4%	72.7%	61.5%
Quarter 2	2017/18	2018/19	Target Met
Actual	59.3%	71.6%	N
Target	85.0%	95.0%	
ICPCs w/i 15 days	67	58	
ICPCs held	113	81	
Comparator			
2016/2017			
England Quartile = 4	England Average = 77.2%		
England Rank = 138/151	London Average = 73.0%		
London Quartile = 4	Statistical Neighbours Average = 76.9%		
London Rank = 29/33	Statistical Neighbours Rank = 11/11		

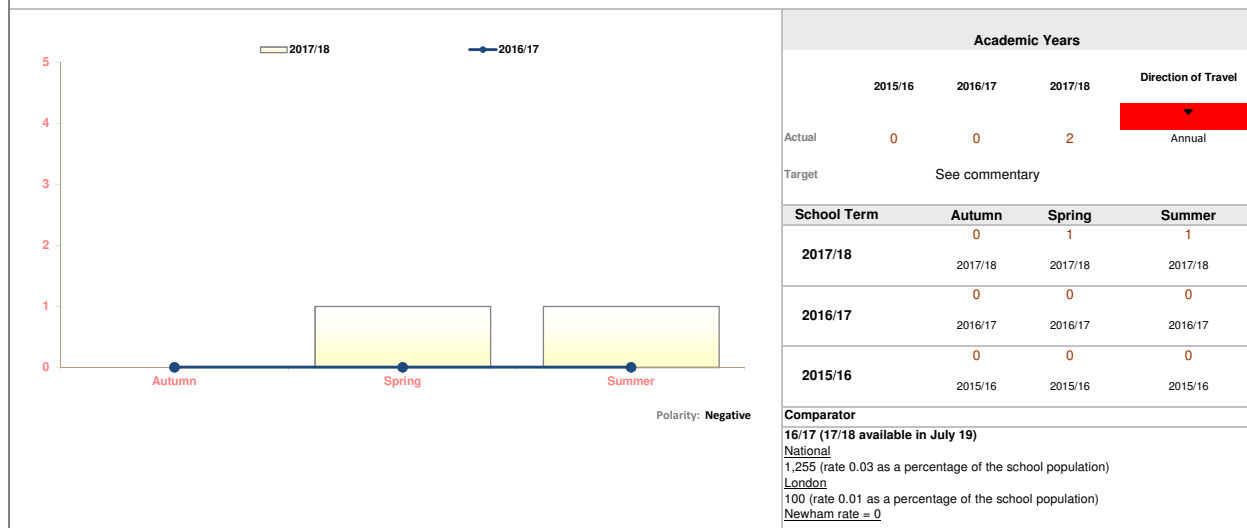
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19 Actual	11.4%	26.3%	56.1%	77.3%	61.5%	72.7%							46.0%
ICPCs w/i 15 days	5	15	32	34	16	8							110
ICPCs held	44	57	57	44	26	11							239
2017/18 Actual	50.0%	87.2%	62.5%	50.0%	66.7%	59.4%	51.3%	28.8%	19.0%	39.4%	52.2%	44.4%	50.9%
ICPCs w/i 15 days	11	41	25	26	22	19	20	15	4	28	12	20	243
ICPCs held	22	47	40	52	33	32	39	52	21	71	23	45	477

## Comments

This is a focus within the improvement plan that is being progressed. There has been an improvement in the number of initial child protection conferences held within 15 days of the initial strategy discussion.

## Permanent Exclusions from Newham Schools (Primary)

Cumulative indicator. Reported in arrears on a termly basis.



## Comments

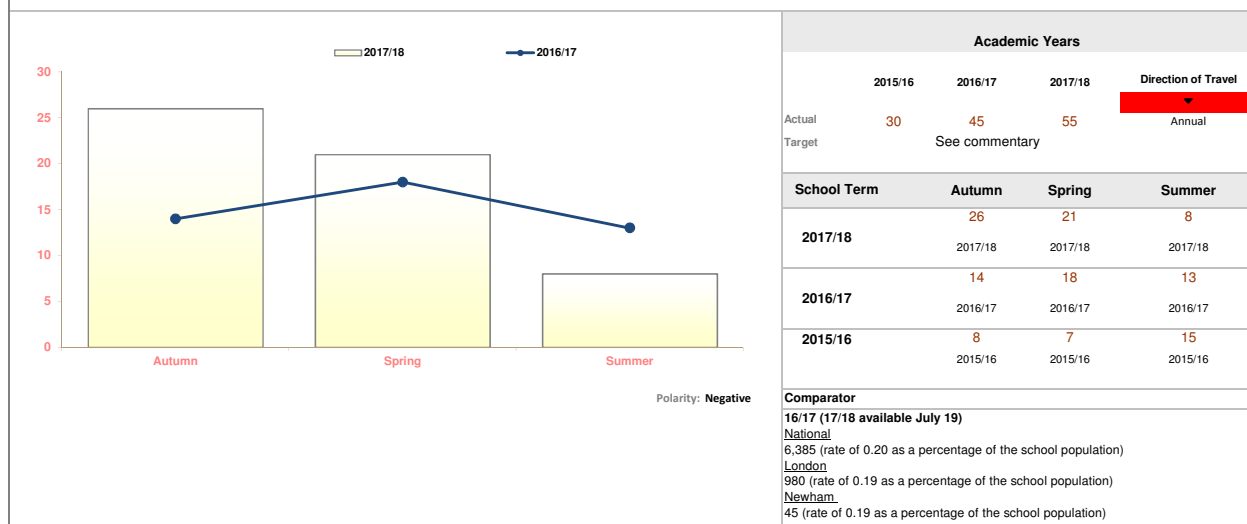
There were two permanent exclusions from Newham primary schools in the 17/18 academic year.

Note: there is a lag of two school terms in data collection to ensure that appeals are accounted for correctly. A target has not historically been set for this indicator due to the nature of the LAs relationship with schools.

## PM11

## Permanent Exclusions from Newham Schools (Secondary)

Cumulative indicator. Reported on a termly basis.



## Comments

There were 55 permanent exclusions in 17/18 (the figures include exclusions from academies). The increase in exclusions is a concern nationally and this is reflected in Newham. The service has developed work on the exclusions pathway with schools in order to try to reduce the pressure for exclusions.

The final summer term exclusion numbers for secondary schools may differ from those presented here as a result of appeals.

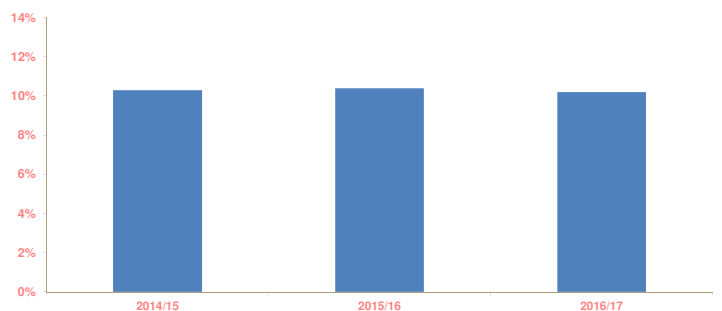
A target has historically not been set for this indicator given the influence the LA has with schools in this area, but this will be reviewed in future given the work with schools on an exclusions pathway.

## Persistent Absence Rates

Cumulative indicator. There has been a definition change for this measure.

Numerator = number of pupils absent from 10% or more of their own individual sessions (one session = half a school day)

Denominator = number of pupils aged 5-15 attending Newham maintained schools



Polarity: Negative

Academic Years				
	2014/15	2015/16	2016/17	Direction of Travel
Actual	10.3%	10.4%	10.2%	Annual
Target	See commentary			
School Term	Autumn	Spring	Year (including Summer term)	
2016/17	N/A	N/A	10.2%	
	2016/17	2016/17	2016/17	
2015/16	N/A	N/A	10.4%	
	2015/16	2015/16	2015/16	
2014/15	N/A	N/A	10.3%	
	2014/15	2014/15	2014/15	
Comparator				
2016/17 (End of Year):				
Inner London average = 10.2%				
England average = 10.8%				

## Comments

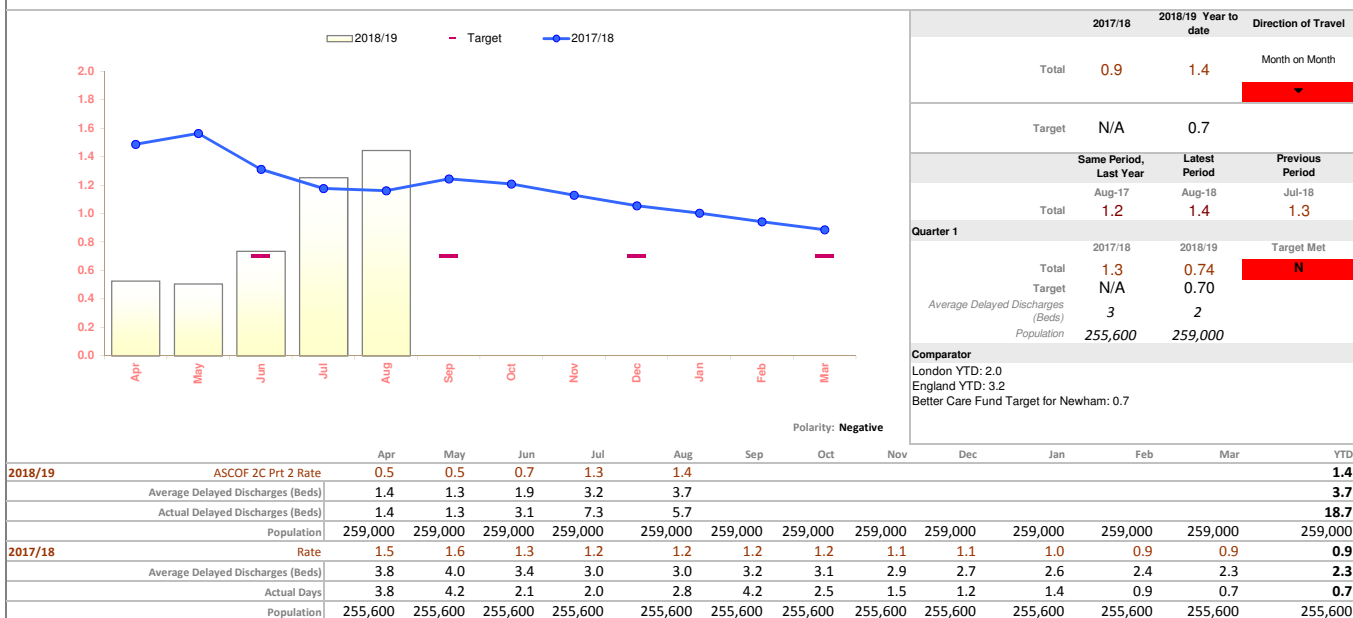
The DfE definition of Persistent Absence has changed. It is now based on the number of pupils who miss 10% or more of their own individual sessions, rather than reaching a standard threshold of absence sessions.

The latest full year absence rate (under the new DfE measure) for the 16/17 academic year is 10.2% (i.e. approximately 1 in every 10 children are classed as 'persistent absentees'). This is in line with the London and below national averages (10.2% and 10.8% respectively). Nationally Newham's rank position on this measure for primary and secondary schools combined was 50th (down from 69th in 15/16). Newham's national rank position on this measure for primary schools only was 129th and for secondary schools 12th. 17/18 data will be available in August 2019.

A target has historically not been set for this indicator given the influence the LA has with schools in this area, but this will be reviewed in future.

## **Adult Social Care**

Delayed transfers of care (DToc) that are attributable to adult social care per 100,000 adult population  
Reported six weeks in arrears. Cumulative average number of Delayed Discharges (DToc Beds) per month.



**Comments**

Please note that NHS Digital publishes this data 6 weeks in arrears. The next publication date: 8th November.

In July and August there were 223 days attributable to LBN by ELFT. Of the 223 days, 149 days are being disputed. 3 individuals are considered by ASC not to be DToc and have been reported without being verified by LBN. This is being resolved as ELFT have agreed that an error has been made and have sent NHS England the incorrect DToc to be retracted. The revised data will be published in early 2019.

Newham performs well in ensuring that people are discharged from hospital safely and timely. In 2017/18 Newham was ranked as one of the best performing boroughs in London (top quartile).

Adult Social Care has a robust DToc sign-off process in place with Newham University Hospital and has written to Barts Health to ensure that equally robust procedures are adhered to by other hospitals in the Trust. This PI measures the impact of hospital services (acute, mental health and non-acute) and Adult Social Care services in facilitating timely and appropriate transfer from all hospitals for all patients. It is a marker of the effective joint working of local partners. In Newham, patients are assessed by LBN's Hospital Team prior to discharge and LBN social work staff are in close contact with NHS hospital colleagues to ensure that transfers are co-ordinated in a timely manner. Similarly, where there are delays, regular meetings are held with hospital colleagues to identify the reasons for delays and to agree processes to minimise this for future where appropriate.

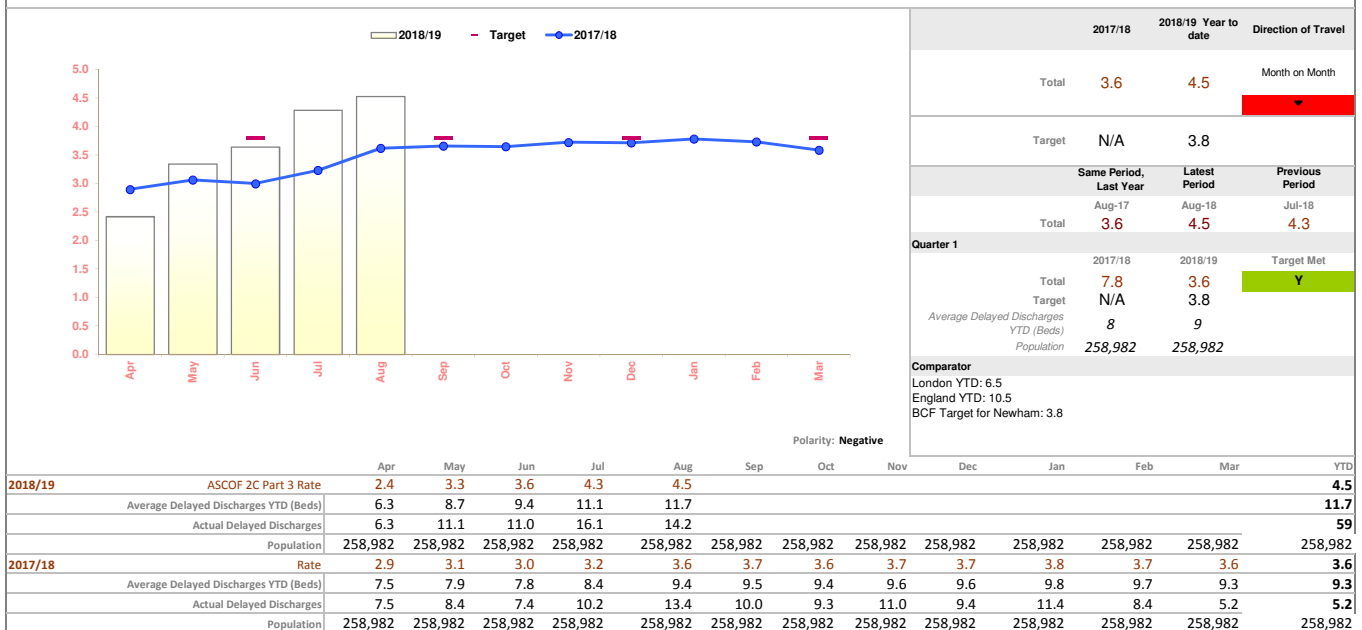
The calculation for ASCOF 2C has changed since the publication of the new ASCOF Framework 2017/18 published in December 2017. The data presented here reflects the new definition. Calculation: Average number of Delayed Discharges (DToc Beds) attributed to Social Care per month divided by Local authority population 18+ times 100,000. NHS Digital advises that the DToc Beds figure is calculated by dividing the number of delayed days during the month by the number of calendar days in the month. This provides a similar figure to the patient snapshot, but is more representative of the entire month rather than providing a view on one particular day.

The Better Care Fund Targets were published on 19th July. The expectations for Health and Wellbeing Boards were set using local baselines from Q3 2017-18.

## Delayed Transfers of Care (Attributable to NHS, Social Care and Both)

Total days - delayed transfers of care, acute and non-acute, per 100,000 population aged 18+.

Reported six weeks in arrears. Cumulative average number of Delayed Discharges (DTOC Beds) per month.



The average DTOC rate for the year to date was 4.5 which is not within target. Despite the increase in the DTOC rate, Newham out-performs the national and London averages in this measure. At the end of 2017-18, Newham was the sixth best-performing in the country for this indicator.

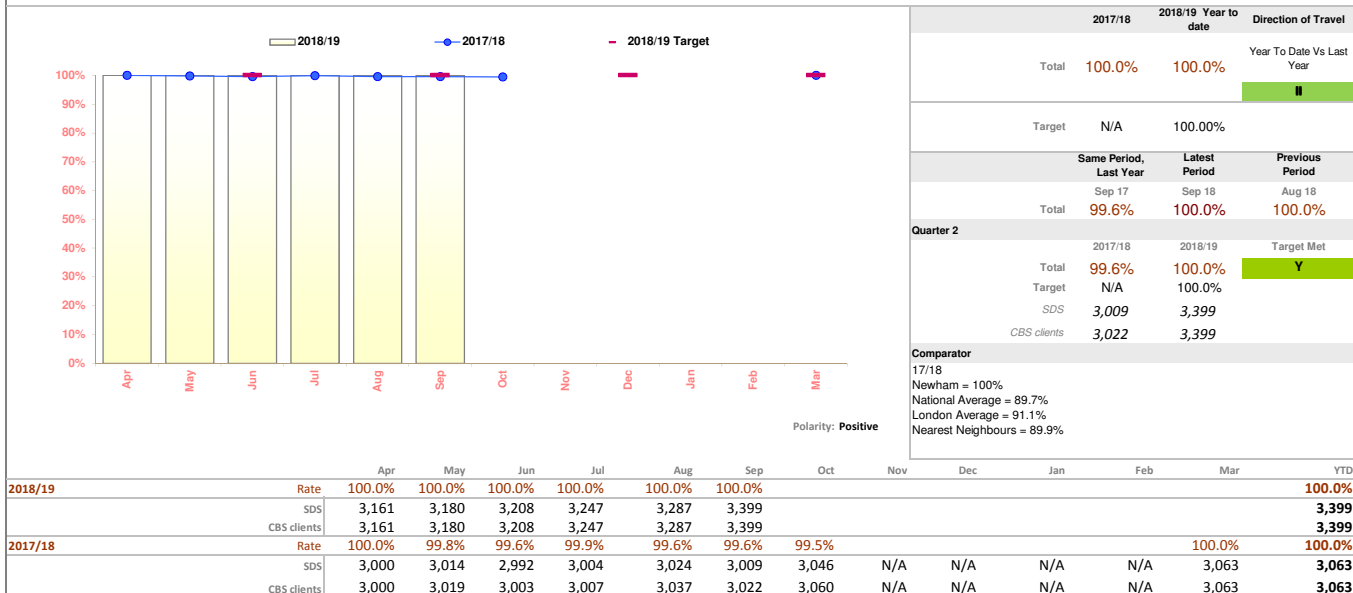
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Calculation: Average number of Delayed Discharges (DTOC Beds) attributed to Social Care per month divided by Local authority population 18+ times 100,000. NHS Digital advises that the DTOC Beds figure is calculated by dividing the number of delayed days during the month by the number of calendar days in the month. This provides a similar figure to the patient snapshot, but is more representative of the entire month rather than providing a view on one particular day.

The Better Care Fund Targets were published on 19th July. The expectations for Health and Wellbeing Boards were set using local baselines from Q3 2017-18.

## Percentage of customers with Self-Directed Support (SDS)

## Snapshot



## Comments

## Current Performance

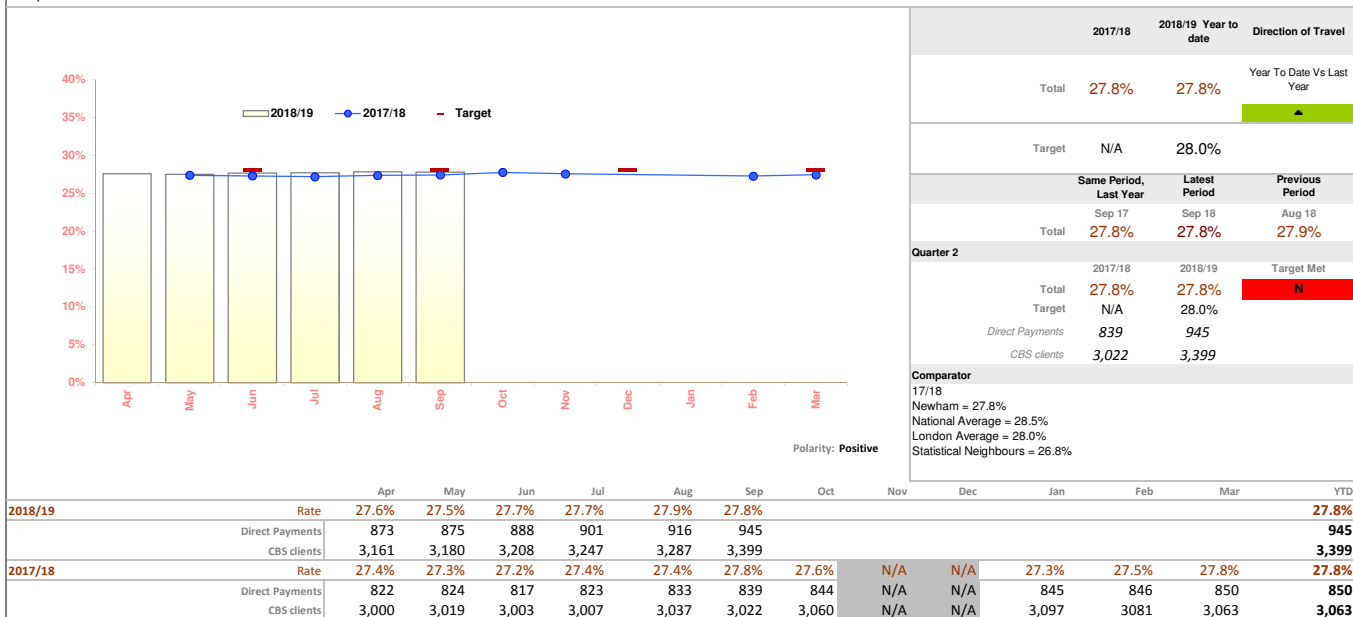
100% of customers receive self-directed support as they are provided with an allocated budget, have a care and support plan and have choice and control in how their care and support is delivered. This is part of the routine assessment and review process. SDS gives customers greater choice and control by enabling them to purchase their own services.

## Definition and Context

Figures calculated from the Short and Long Term (SALT) social care data return. Data for November 2017 to February 2018 was not available due to system changes.

## Percentage of customers with Direct Payments

## Snapshot



## Comments

## Current Performance

27.8% of customers were in receipt of a direct payment at the end of September 2018. 2018/19 performance has improved due to a new Direct Payment Group that the service has implemented to improve the intake of direct payment services.

## Actions and Activity

Direct payments are offered to customers as part of the routine assessment and review process. Some customers choose not to take direct payments as they feel that managing the payments could be an additional burden. Processes such as a pre-paid card scheme are available to reduce the bureaucracy of managing payments.

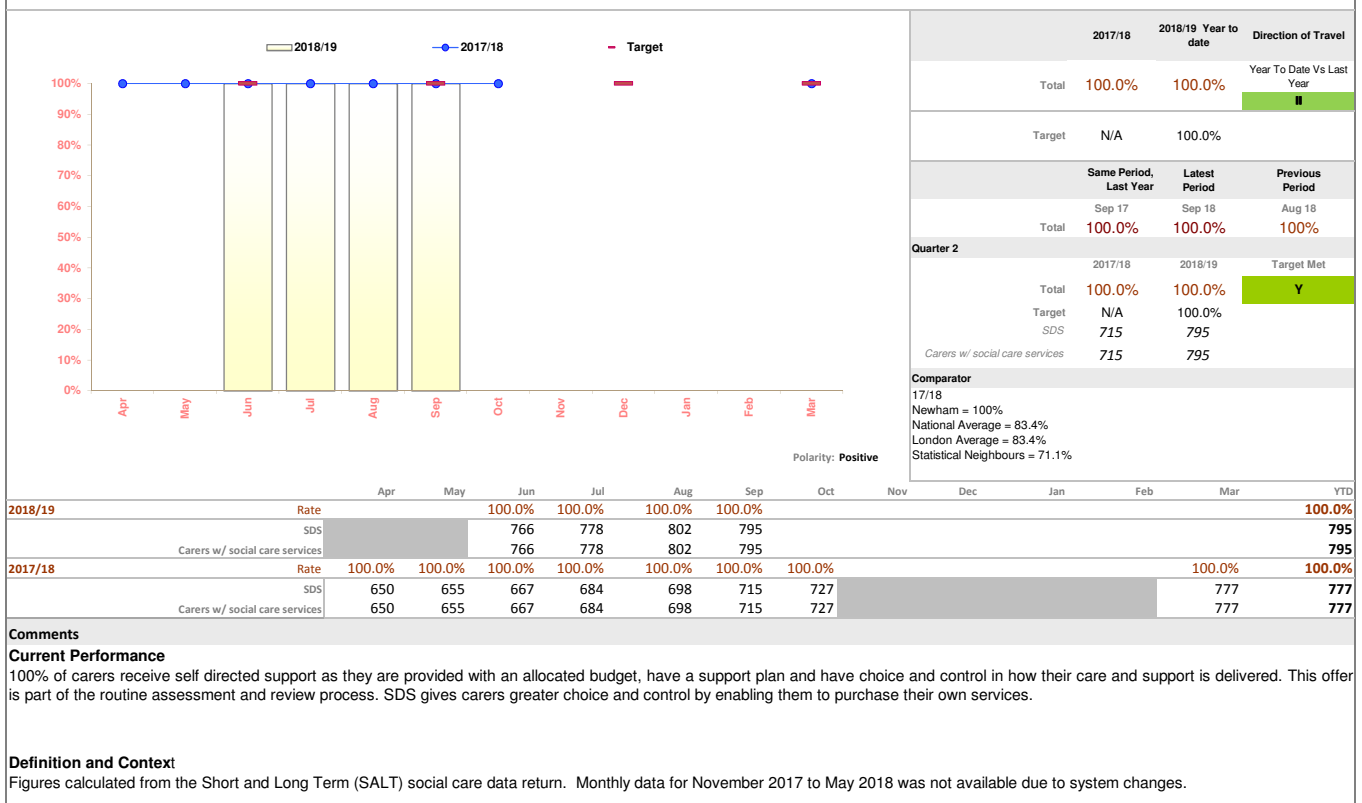
Adult Social Care undertook a sample analysis to understand the reasons why customers do not take up direct payments and to understand why some people choose to end their direct payments. The key reasons are: customer death; issues with personal assistants or homecare providers; customer moves out of borough; increase in support needs which requires a residential setting.

## Definition and Context

Figures calculated from the Short and Long Term (SALT) social care data return. Snapshot indicator based on services in place on the last day of the month. Data for November and December 2017 was not available due to system changes.

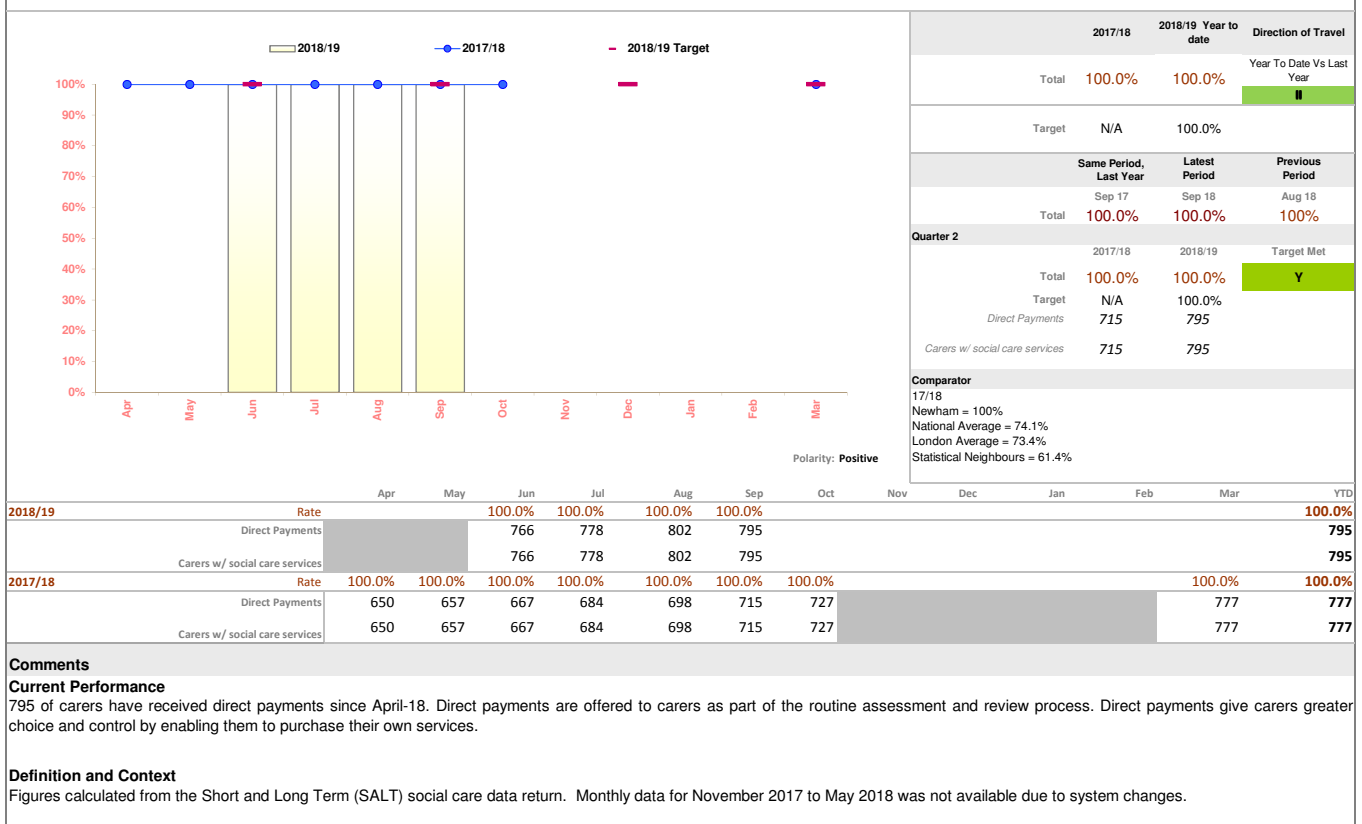
## Percentage of carers using social care who receive Self-Directed Support

Cumulative



## Percentage of carers receiving social care who receive Direct Payments

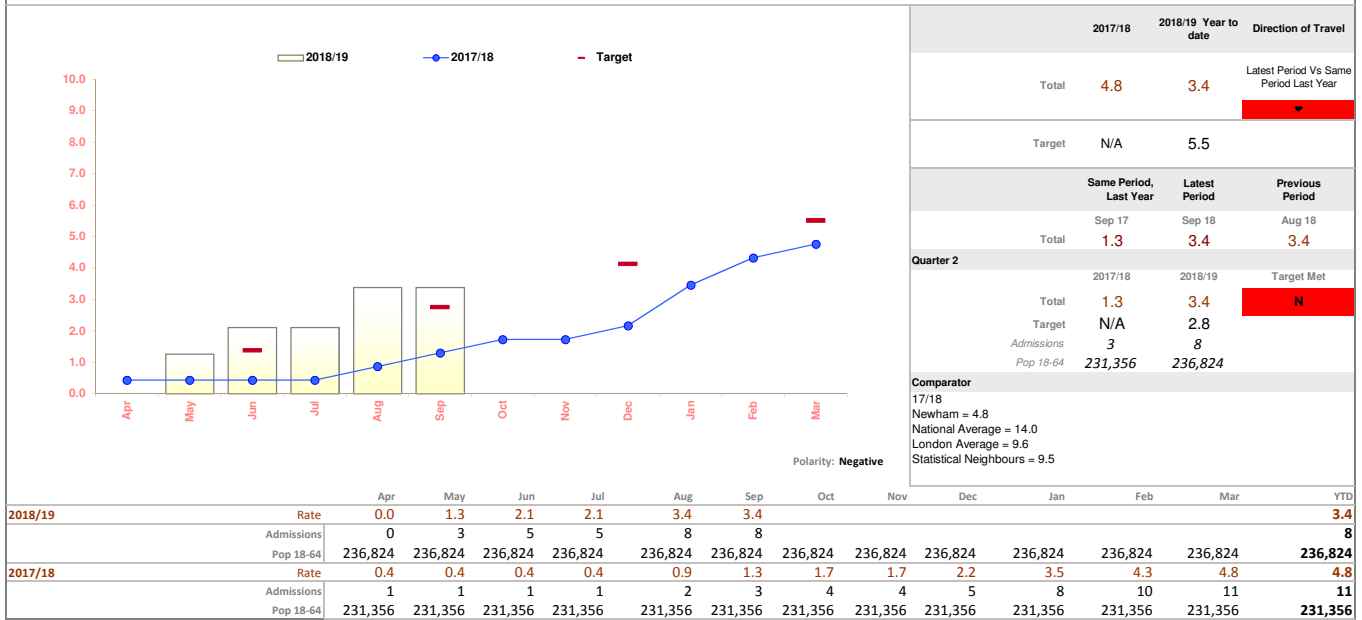
Cumulative.





## Permanent admissions to residential and nursing care homes (Adults 18-64) per 100,000 population

Cumulative



## Comments

## Current Performance

There have been eight permanent admissions to residential and nursing for people aged 18-64. All of these placements have been ratified and agreed that there is no other option to accommodate the customer's needs. An example of this would be when a customer has a degenerative condition where needs could not be met at home.

## Actions and Activity

Customers are placed into permanent nursing and residential care only once options for community-based support have been exhausted. These customers are reviewed with a view to increase their independence.

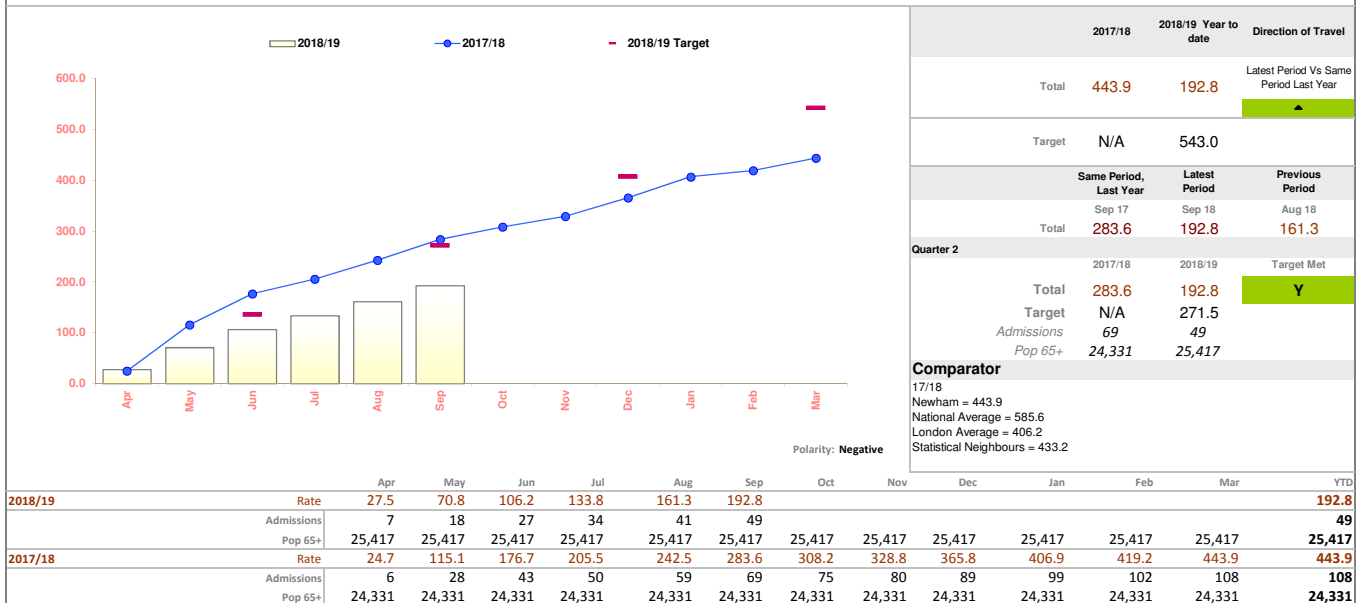
## Definition and Context

Newham performs well in this indicator area and is 3rd highest performing borough in London.

Figures calculated from the Short and Long Term (SALT) social care data return.

## Permanent admissions to residential and nursing care homes (adults 65+) per 100,000 population

Cumulative



## Comments

## Current Performance

There have been 49 permanent admissions to nursing or residential care for customers aged 65+ this year to date.

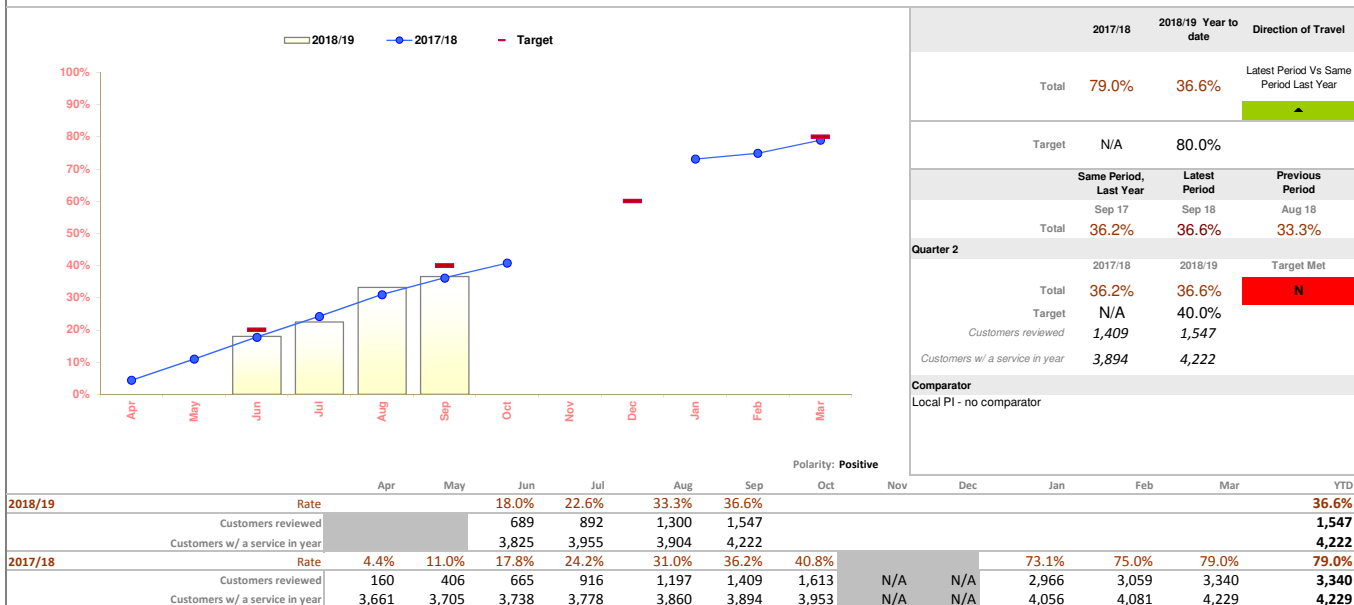
## Actions and Activity

Since October 2017 a discharge to assess pathway went live at Newham University Hospital whereby the customer returns home with wraparound care and support and then has a Care Act assessment once they are at home. As a result, the new discharge pathway has had a positive impact on this indicator. Customers are placed into permanent nursing and residential care only once options for community-based support have been exhausted. The complexity of cases involving customers in placements is increasing. The authority has additional responsibilities in terms of Best Interest Assessments and Deprivation of Liberty Safeguards which can include work in relation to the Court of Protection such as preparing witness statements. ASC also ensures it works with partners such as Health and Housing to achieve the best outcomes for the customer which illustrates the complexity of cases.

## Definition and Context

Figures calculated from the Short and Long Term (SALT) social care data return.

% of all customers reviewed or reassessed (Cumulative)



Comments

Current Performance

36.6% of customers have had a review between April and September 2018.

Actions and Activity

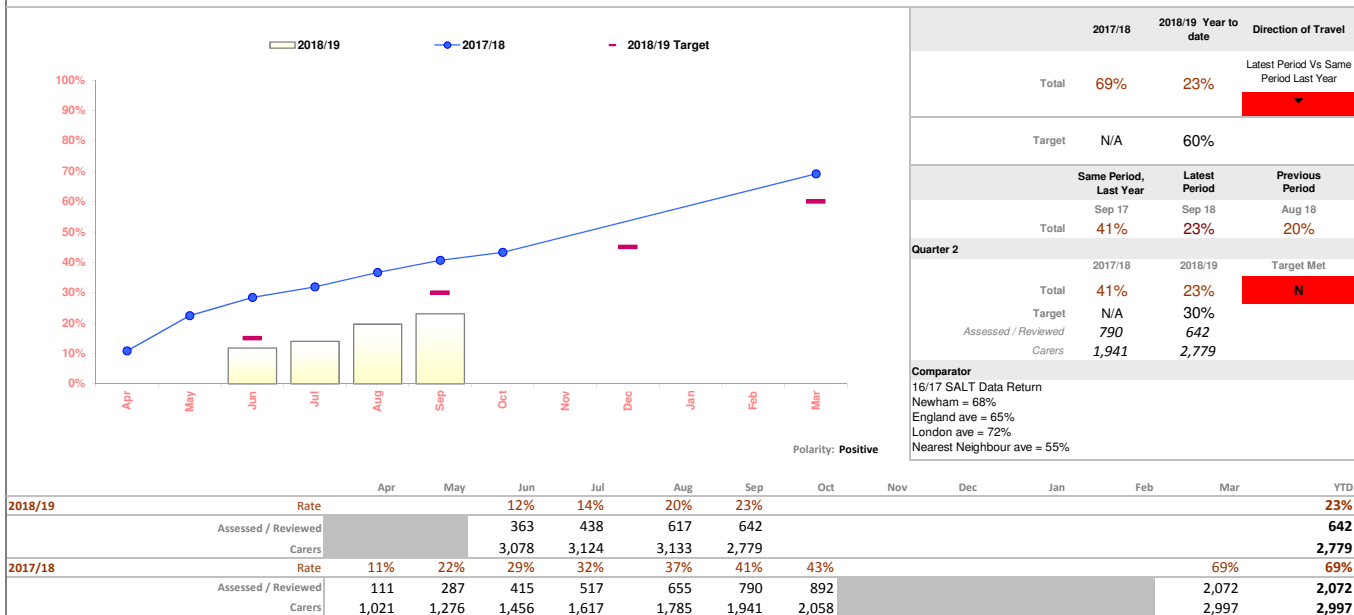
Each social worker has a target number of reviews to complete each month. This is being monitored on a weekly basis by review managers. The trajectory is that 80% of customers will be reviewed by year end. Some customers will have multiple reviews or reassessments in a year, for example if they have been in hospital, therefore the total number of reviews and reassessments will be higher than the number of individual customers reviewed or reassessed as reported for this indicator.

Definition and Context

% of long term service customers reviewed or reassessed in the financial year. Monthly data for some months was not available due to system changes.

Percentage of carers assessed, reassessed or reviewed

Cumulative



Comments

Current Performance

23% of carers have been assessed or reviewed between April and September 2018.

Actions and Activity

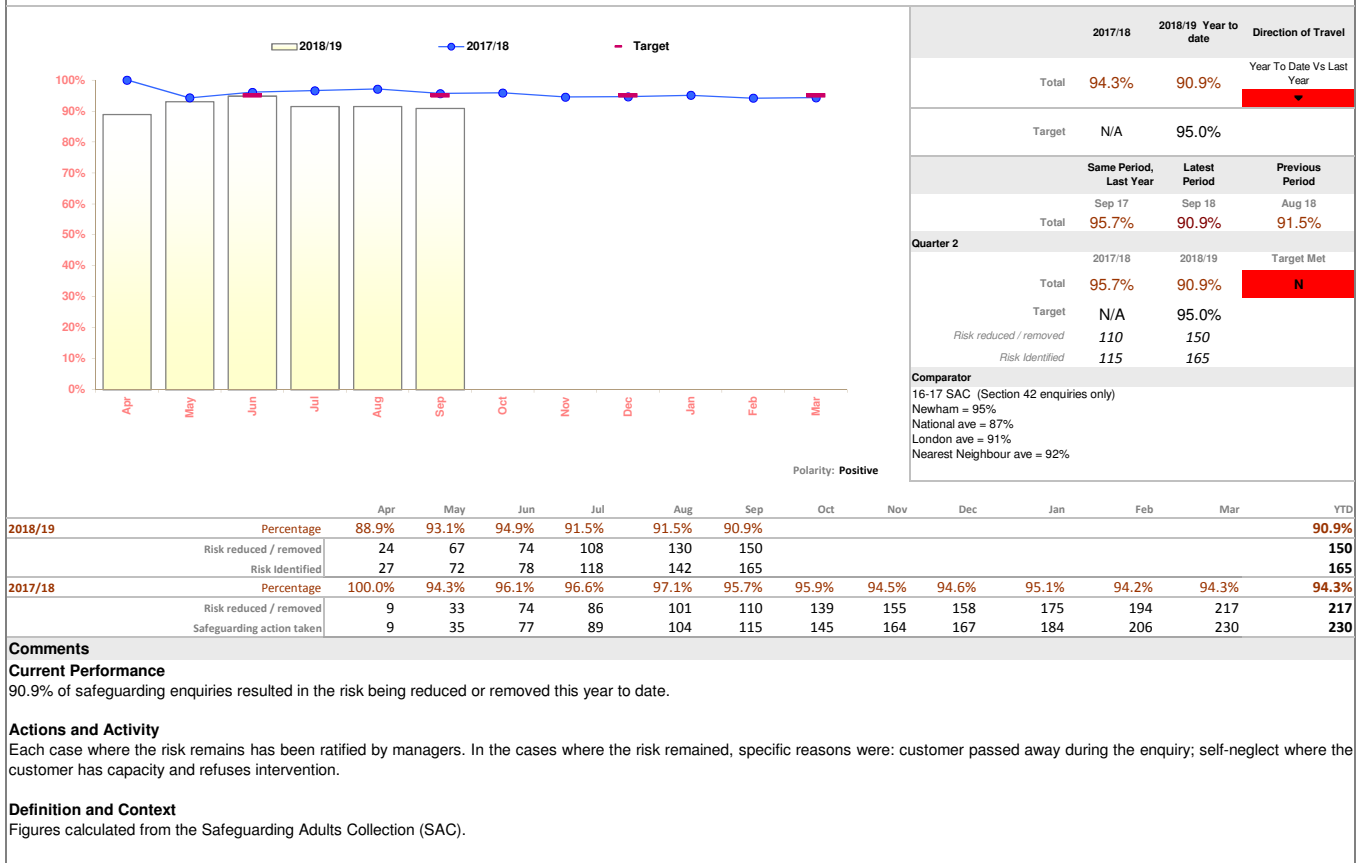
There are a number of carers who have been offered a review but have declined. There is a targeted piece of work led by the Principal Social Workers to analyse current activity and how to improve performance.

Definition and Context

Figures calculated from the Short and Long Term (SALT) social care data return. Monthly data for November 2017 to May 2018 was not available due to system changes.

## Percentage of safeguarding enquiries where a risk was identified and the risk was removed or reduced

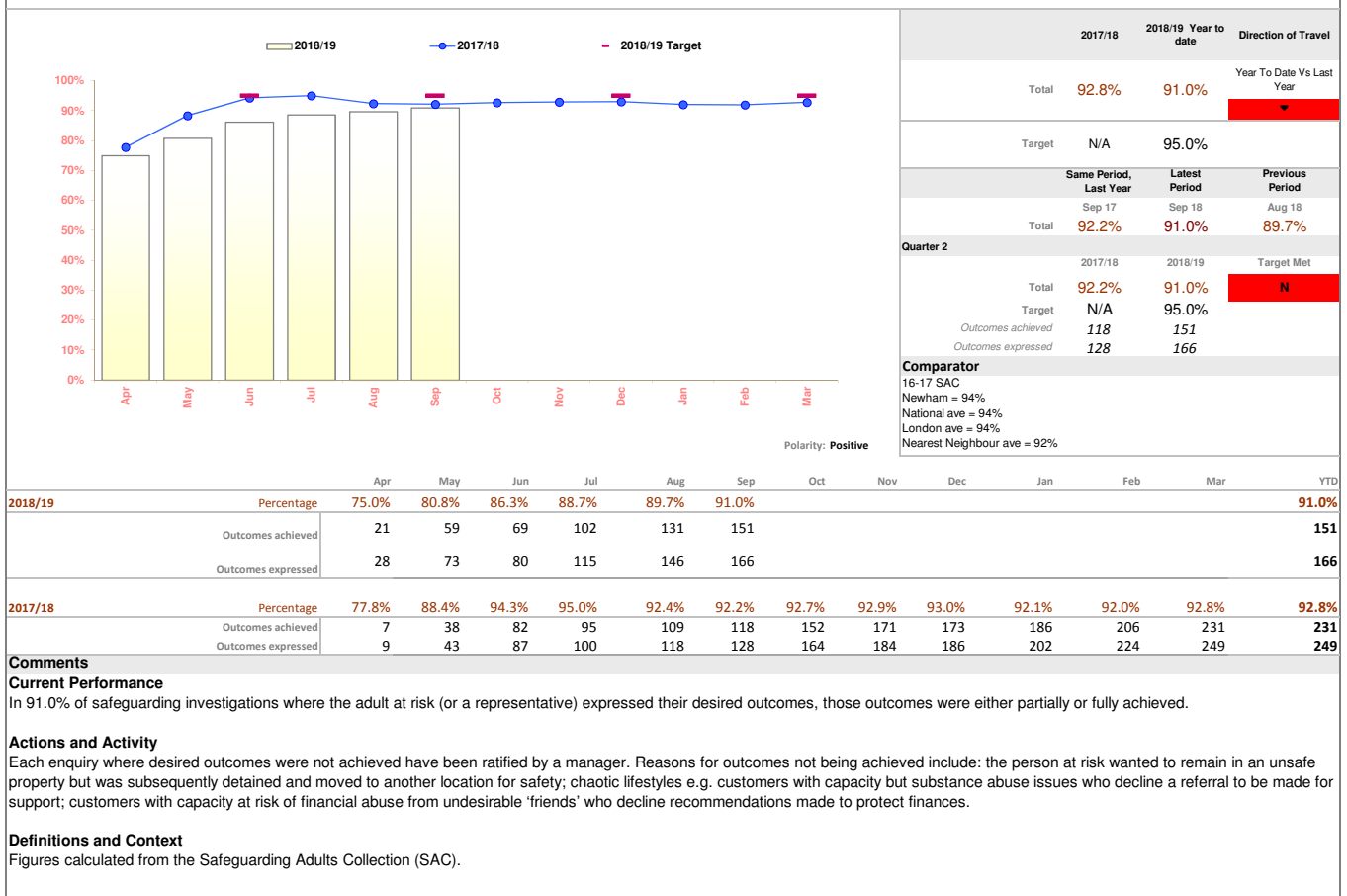
Cumulative

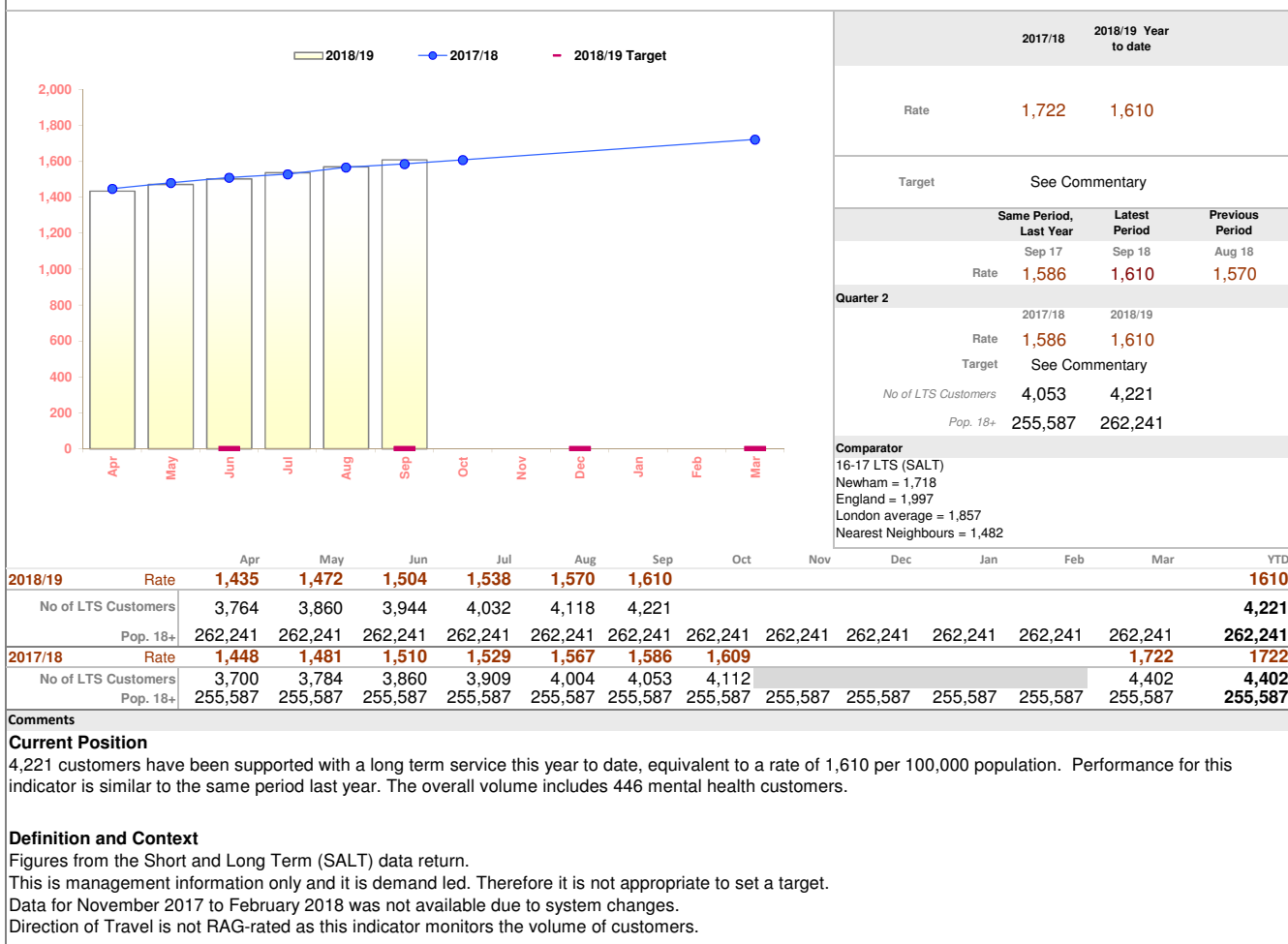


## % of safeguarding enquiries where the desired outcomes were fully or partially achieved

## Percentage of safeguarding enquiries where the desired outcomes of the person at risk were fully or partially achieved

Cumulative

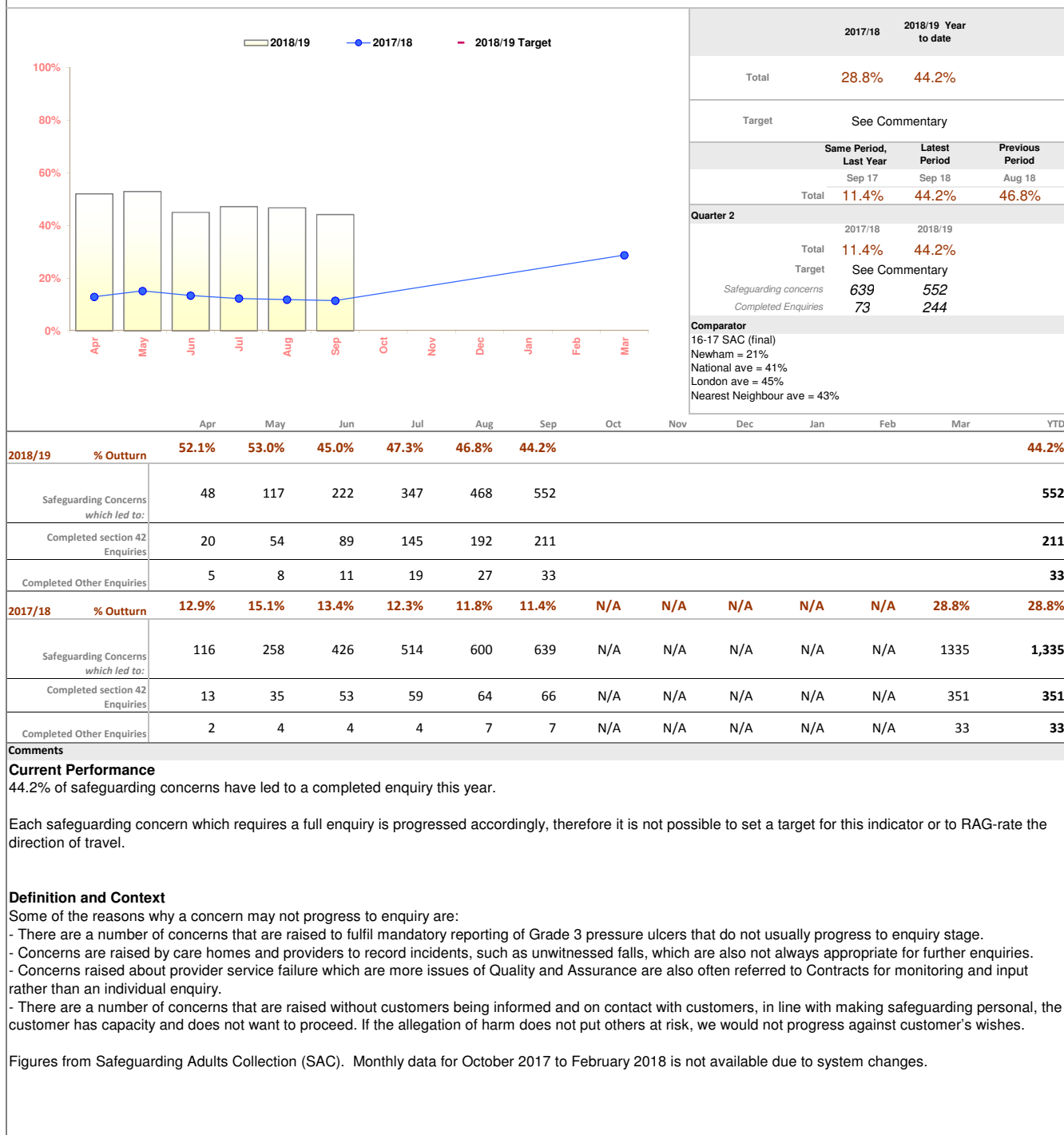




## Safeguarding Concerns

% of safeguarding concerns which led to a completed enquiry

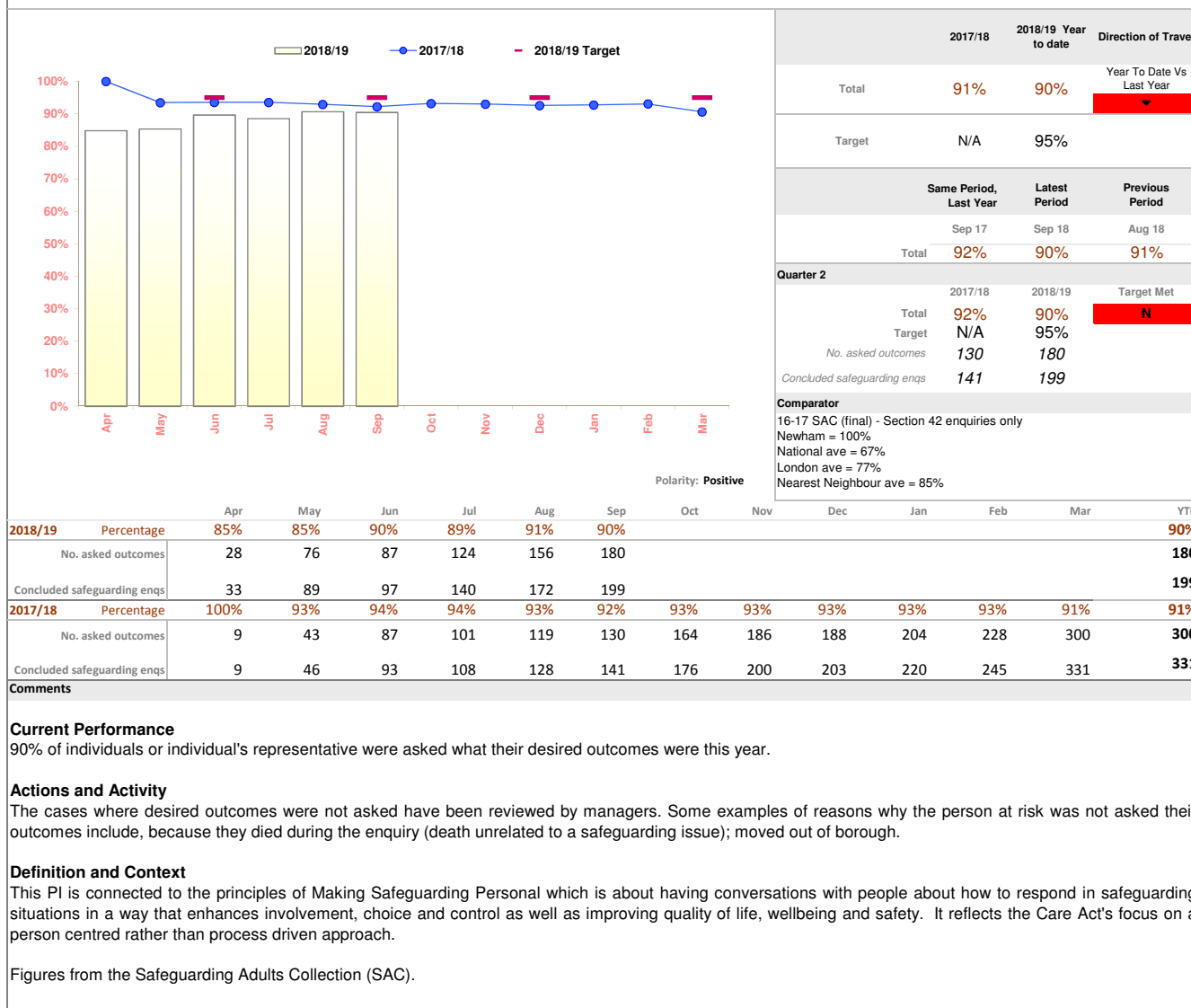
Cumulative



## Safeguarding Enquiries

Safeguarding enquiries - % of adults and representatives who were asked what their desired outcomes were

Cumulative



### Comments

#### Current Performance

90% of individuals or individual's representative were asked what their desired outcomes were this year.

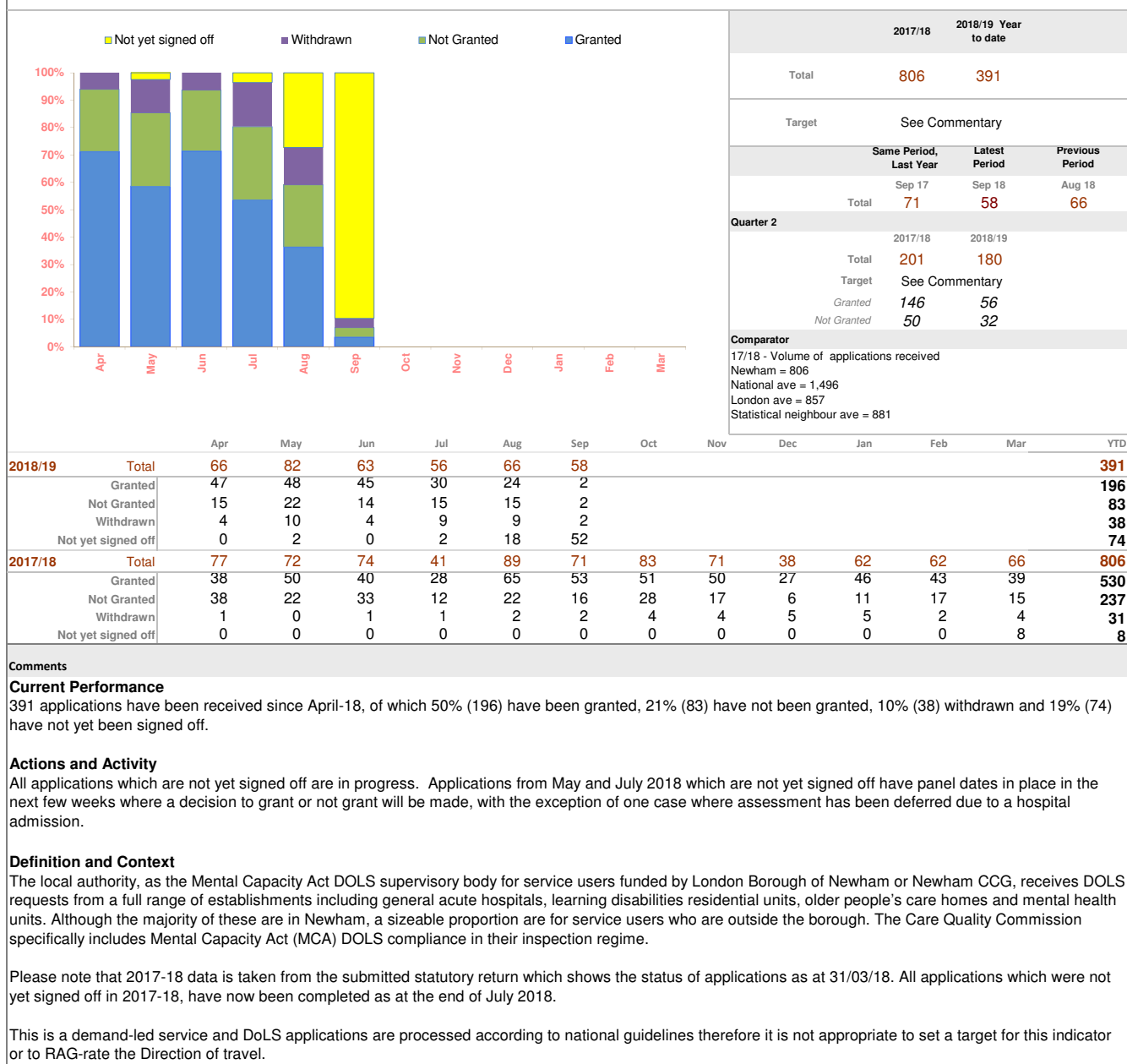
#### Actions and Activity

The cases where desired outcomes were not asked have been reviewed by managers. Some examples of reasons why the person at risk was not asked their outcomes include, because they died during the enquiry (death unrelated to a safeguarding issue); moved out of borough.

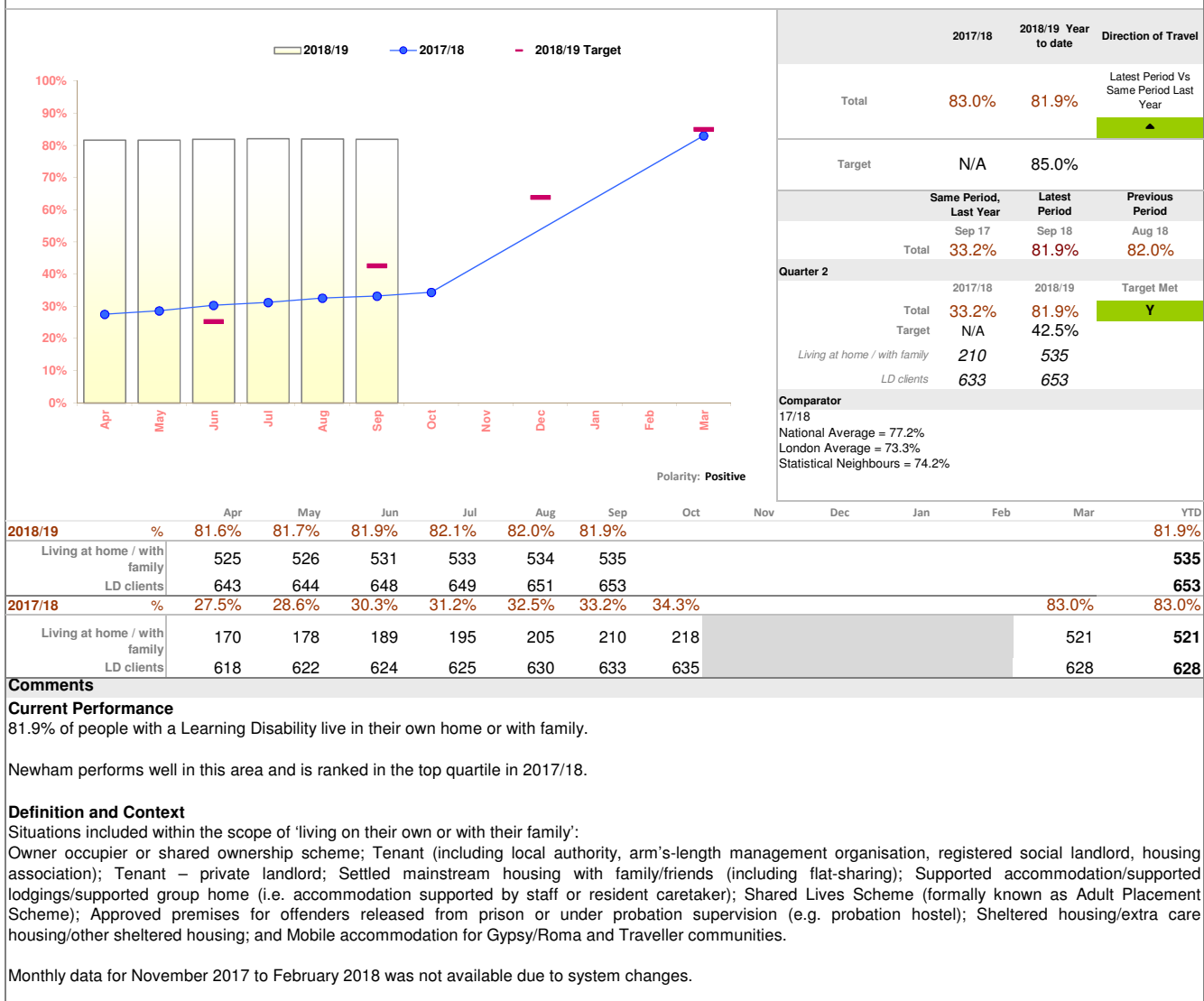
#### Definition and Context

This PI is connected to the principles of Making Safeguarding Personal which is about having conversations with people about how to respond in safeguarding situations in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety. It reflects the Care Act's focus on a person centred rather than process driven approach.

Figures from the Safeguarding Adults Collection (SAC).



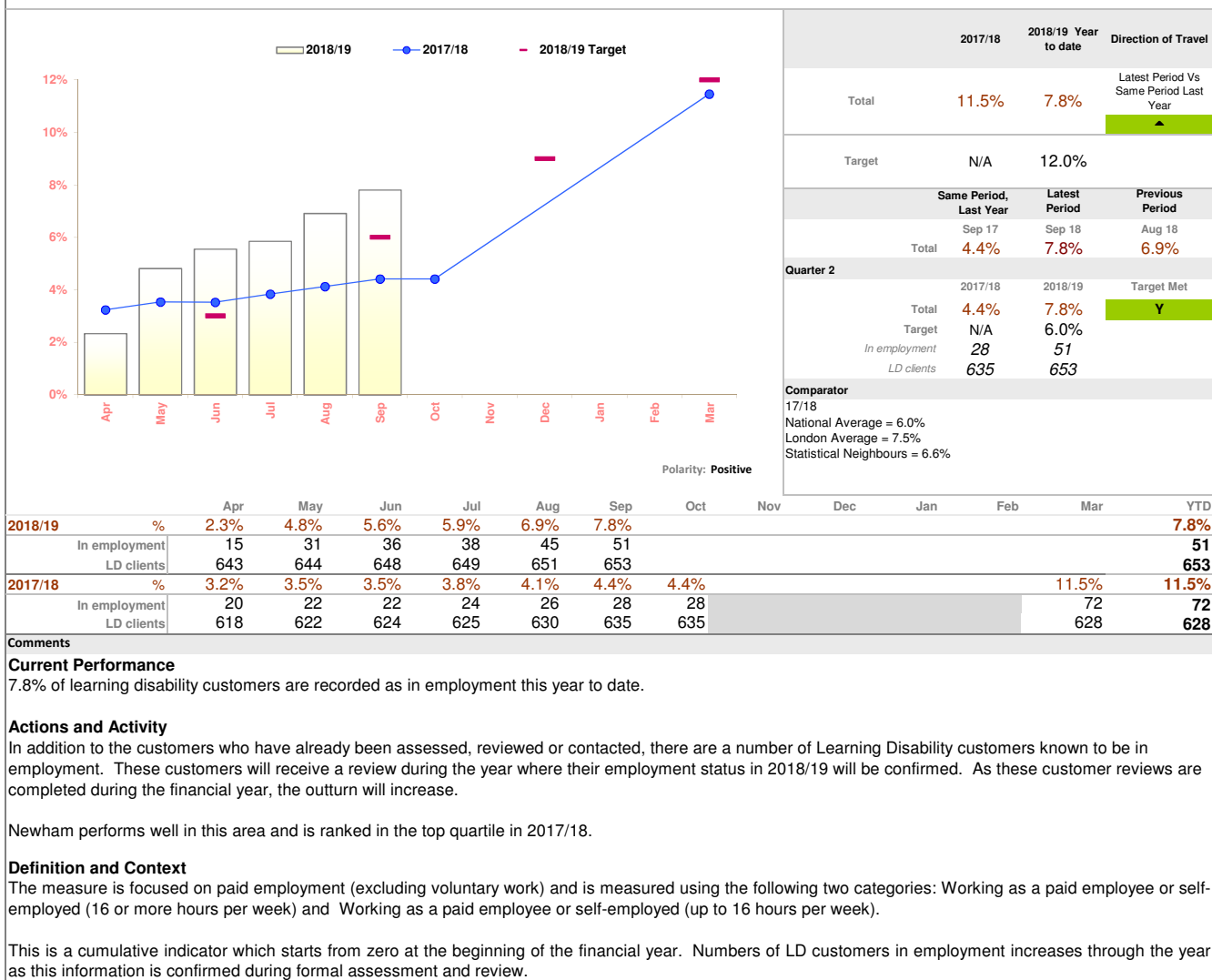
Cumulative



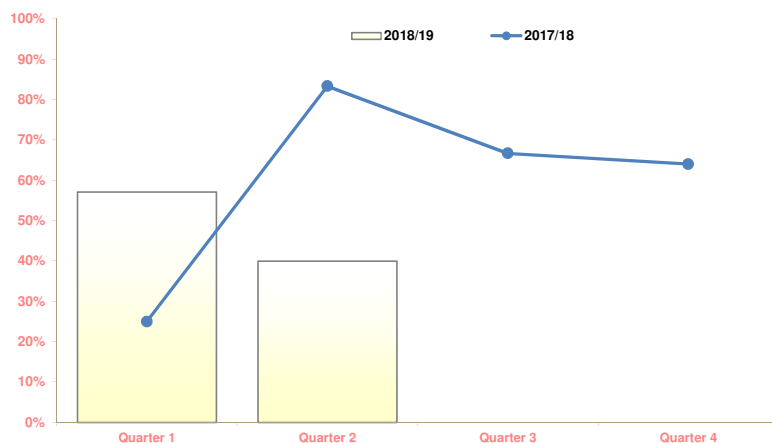


% of people with a Learning Disability in receipt of Long Term Services in employment

Cumulative



## Proportion of providers who have met quality standards (CQC)



Polarity: Positive

	2017/18	2018/19 Year to date	Direction of Travel
Total	63%	52%	Year To Date Vs Last Year ▼
Target	See Commentary		
Good / outstanding Providers Inspected	26 41	16 31	
<b>Quarter 2</b>			
In-quarter performance	2017/18	2018/19	
Total	83%	40%	
Target	See Commentary		
Good / outstanding Providers Inspected	5 6	4 10	
<b>Comparator</b>			
Local indicator - no comparator			

Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4	YTD
<b>2018/19 Actuals</b>	<b>57%</b>	<b>40%</b>			<b>52%</b>
<b>Total inspections, of which:</b>	<b>21</b>	<b>10</b>			<b>31</b>
Outstanding	0	1			1
Good	12	3			15
Requires Improvement	7	4			11
Inadequate	2	2			4
<b>2017/18 Actuals</b>	<b>25%</b>	<b>83%</b>	<b>67%</b>	<b>64%</b>	<b>63%</b>
<b>Total inspections, of which:</b>	<b>4</b>	<b>6</b>	<b>6</b>	<b>25</b>	<b>41</b>
Outstanding	0	0	0	1	1
Good	1	5	4	15	25
Requires Improvement	1	1	2	6	10
Inadequate	2	0	0	3	5

## Comments

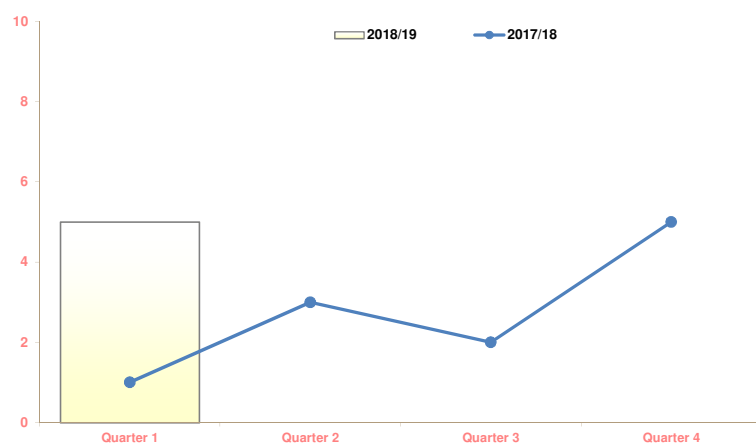
31 CQC inspections have taken place this year to date. 52% of providers have been rated as 'Good' or 'Outstanding' overall. Adult Social Care works closely with providers and the CQC to improve services.

Please note the quarterly figures relate to inspections undertaken within the quarter.

There is no target for this indicator as inspections largely relate to third parties outside the direct control of the council.

## Provider Suspensions

### Number of providers under suspension



Polarity: **Negative**

	Quarter 1	Quarter 2	Quarter 3	Quarter 4	YTD
2018/19 No. under Suspension	5	5			5
2017/18 No. under Suspension	1	3	2	5	5

	2017/18	2018/19 Year to date	Direction of Travel
Total	5	5	Year To Date Vs Last Year II
Target	See Commentary		
2018/19 No. under Suspension	5	5	
<b>Quarter 1</b>			
	2017/18	2018/19	
Total	1	5	
Target	See Commentary		
2018/19 No. under Suspension	1	5	
<b>Comparator</b>			
Local indicator - no comparator			

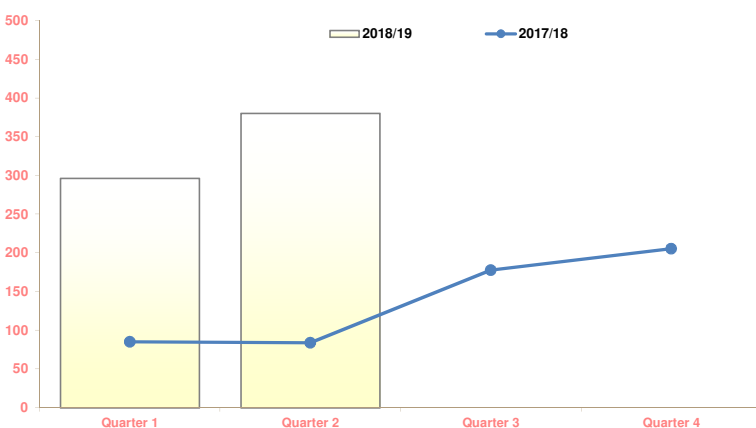
#### Comments

There were five providers under suspension at the end of quarter 2. Newham is working closely with the providers to support them to improve their performance so that suspensions can be lifted as soon as possible.

There is no target for this indicator as suspensions relate to third parties outside the direct control of the council.

## Average length of Suspensions (days)

### Average length of Suspensions (days)



Polarity: **Negative**

Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4	YTD
2018/19 Ave. days	296	380			380
No. of providers	5	5			5
Total days	1481	1901			1901
2017/18 Ave. days	85	84	178	205	205
No. of providers	1	3	2	5	5
Total days	85	251	355	1026	1026

	2017/18	2018/19 Year to date	Direction of Travel
Total	205	380	Latest Period Vs Same Period Last Year ▼
Target	See Commentary		
No. of providers	5	5	
Total days	1,026	1,901	
<b>Quarter 2</b>			
	2017/18	2018/19	
Total	84	380	
Target	See Commentary		
No. of providers	3	5	
Total days	251	1,901	
<b>Comparator</b>			
Local indicator - no comparator			

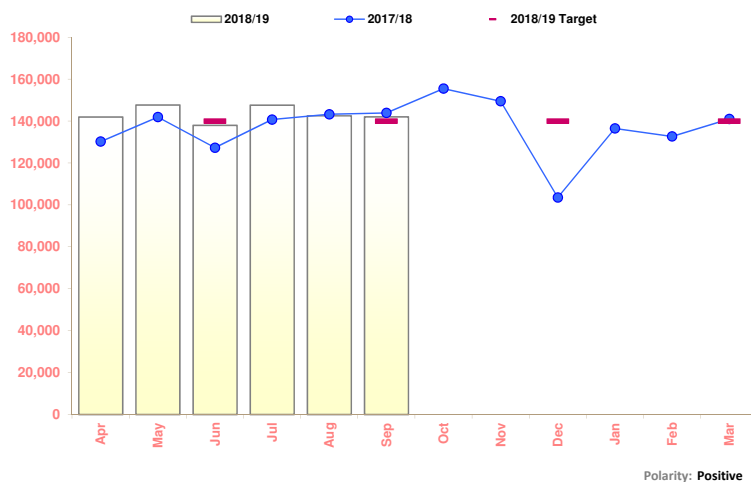
#### Comments

The average number of days providers were suspended at the end of Q2, 2018/19 was 380. In total, there were five providers under suspension. Newham is working closely with the providers to support them to improve their performance so that suspensions can be lifted as soon as possible.

There is no target for this indicator as suspensions relate to third parties outside the direct control of the council.

# **Community**

Use of Libraries (Attendance to Libraries)



	2017/18	2018/19 Year to date	Direction of Travel
Actual	827,266	859,817	Latest Period Vs Same Period Last Year
Target	N/A	1,678,850	
	Same Period, Last Year	Latest Period	Previous Period
	Sep 17	Sep 18	Aug 18
Actual	143,898	142,024	142,536
Quarter 2			
In Quarter Performance	2017/18	2018/19	Target Met
Actual	427,862	432,185	Yes
Target	N/A	419,712	
Comparator			
Latest LAPS data (Q1 2018-19): total visits per 1000 population, Newham = 1247, 9 boroughs returned data, average = 1158, 4 out of 9.			

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19 Total	141,962	147,677	137,993	147,625	142,536	142,024							859,817
Monthly Visits	141,962	147,677	137,993	147,625	142,536	142,024							
2017/18 Total	130,217	141,896	127,291	140,729	143,235	143,898	155,503	149,466	103,567	136,493	132,667	140,969	1,645,931
Monthly Visits	130,217	141,896	127,291	140,729	143,235	143,898	155,503	149,466	103,567	136,493	132,667	140,969	

Comments

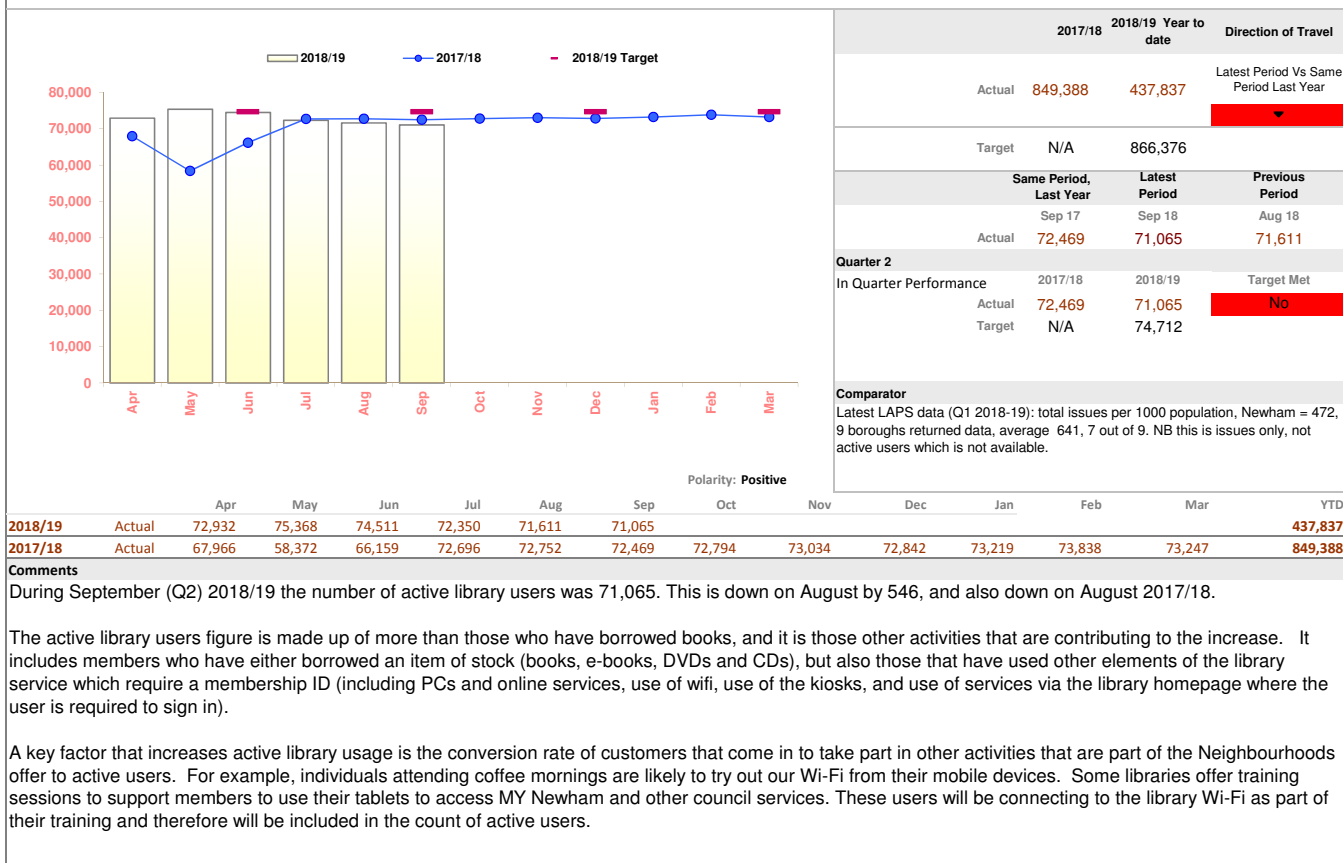
At the end of September (Q2) 2018/19 there were a total of 859,817 visits to Newham libraries. The cumulative increase to the same point over the preceding year (32,551 more visits) has been achieved by class visits as part of the Summer Reading Challenge offer to schools. This has allowed the service to register many new young people with a library card which has in turn increased book issues.

There continues to be the regular ongoing activities in libraries (including coffee mornings, games, craft, reading and homework clubs, ESOL classes and advice and information sessions).

The annual target of 1,678,850 has been divided by 12 to give an average monthly target of 139,904.

## Active Library Users

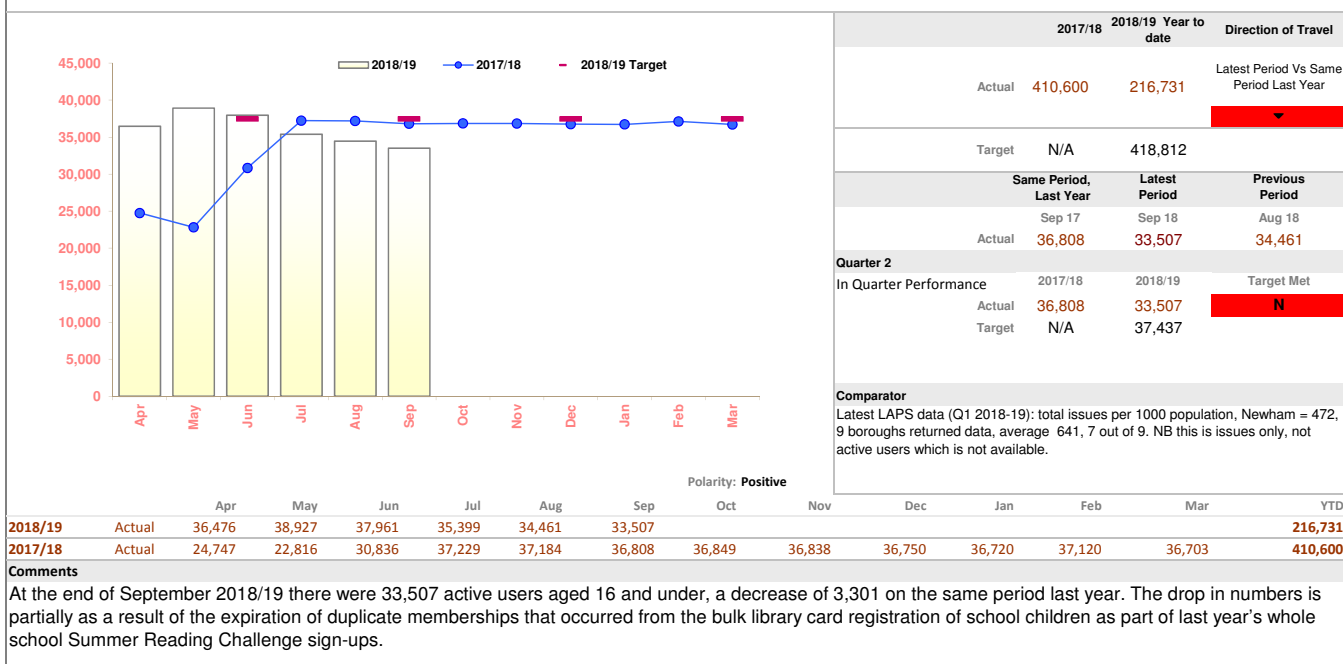
(Provides a monthly Snapshot based on the number of members using library card in previous 12 months)



## ACCo4.2

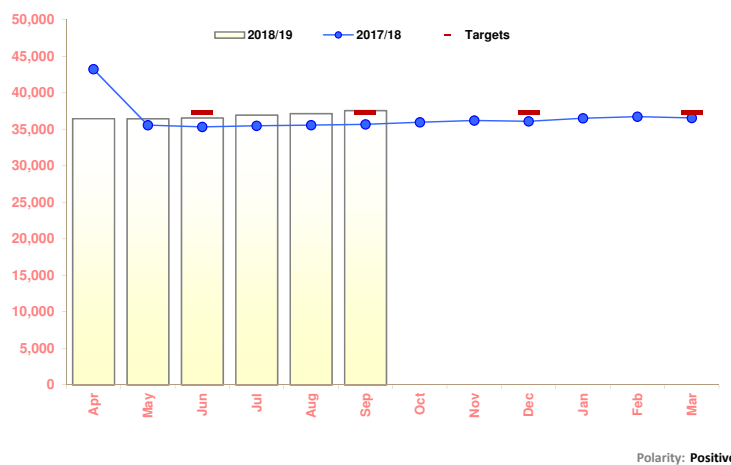
## Active Library Users (16 and under)

(Provides a monthly Snapshot based on the number of members using library card in previous 12 months)



## Active Library Users (17 and over)

(Reports a Snapshot each month based on the number of members (aged 17 years and over) using library card in previous 12 months)

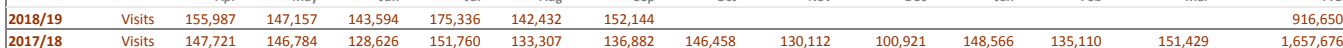


	2017/18	2018/19 Year to date	Direction of Travel
Actual	438,788	221,106	Latest Period Vs Same Period Last Year
Target	N/A	447,564	
	Same Period, Last Year	Latest Period	Previous Period
	Sep 17	Sep 18	Aug 18
Actual	35,661	37,558	37,150
<b>Quarter 2</b>			
In Quarter Performance	2017/18	2018/19	Target Met
Actual	36,550	37,558	Y
Target	N/A	37,275	
<b>Comparator</b>			
Latest LAPS data (Q1 2018-19): total issues per 1000 population, Newham = 472, 9 boroughs returned data, average 641, 7 out of 9. NB this is issues only, not active users which is not available.			

		Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19	Actual	36,456	36,441	36,550	36,951	37,150	37,558							221,106
2017/18	Actual	43,219	35,556	35,323	35,467	35,568	35,661	35,945	36,196	36,092	36,499	36,718	36,544	438,788

## Comments

In September the number of active users aged 17 and over was 37,558 compared to 37,150 in August 2018 and 35,661 in September 2017.



The total number of visits to leisure centres in September was 152,144, this is 9,712 more than the number of visits in August.

September saw the summer holidays come to a close and the start of the 'So... No Excuses' campaign. Customers could join activeNewham for 6 weeks and pay a reduced fee of £40. After joining they received a free t-shirt. Participants were encouraged to take a selfie wearing the t-shirt and upload it to their favourite social media site with the hashtag '#ANNOEXCUSES'. There was also a prizeword offering one year's free membership. This promotion ran until 14th October. The service sent out flyers, posted on social media, emailed customers, had Newham Mag adverts, and launched a mobile ad for the final 2 weeks push.

Overall the participation figures for swimming has increased, but there has been a slight decrease in the numbers for the general swimming sessions in comparison with August 2018. This decrease is expected, as the previous month saw a larger programme of general swimming sessions along with fun swimming sessions being available as part of the summer holiday programme. As the timetable for general swimming returns to the pre-school holiday programme, we expect to see numbers comparable to previous months.

Newham Leisure Centre has seen a number of schools make use of the wide range of facilities at the centre. The schools have been using, 3g pitches, gym and sports hall to do activities such as badminton, basketball and cricket.

September attendances to Balaam, East Ham, Newham and Atherton Leisure Centres are greater than the same period last year. Leisure Centre comparison - 2017/18 vs 2018/19. Balaam - (101,903 vs 115,051 - 12.9% increase), East Ham - (236,798 vs 257,208 - 8.6% increase), Newham - (207,803 vs 241,882 - 16.4% increase), Atherton (242,254 vs 250,458 - 3.4% increase).

There were 8,730 attendances to the Manor Park Fitness Centre in September.

The last leisure client visit took place in September 2018. The average leisure client score for Newham in (all four centres combined) was 85.24% (scored for different aspects of the service i.e. cleanliness, customer care, maintenance).

East Ham - 84.38%  
Balaam - 83.86%  
Atherton - 89.93%  
Newham - 82.78%

The centres are continuing to work on improving overall scores in the areas where potential improvement has been flagged up.

Overall participation figures for the month are comparable with year on year figures and are on trend with industry expectations.

Definition: This indicator counts the number of attendances to all Leisure Centres as opposed to visits. If a person attends for more than one activity when they visit the leisure centre, each activity will be counted in the PI (e.g. if a person goes to the gym and uses the swimming pool, this will count as 2 in the PI).

Targets for this indicator are in the process of being reviewed as part of the 2018/19 review of indicators. This will be completed by the end of November 2018.

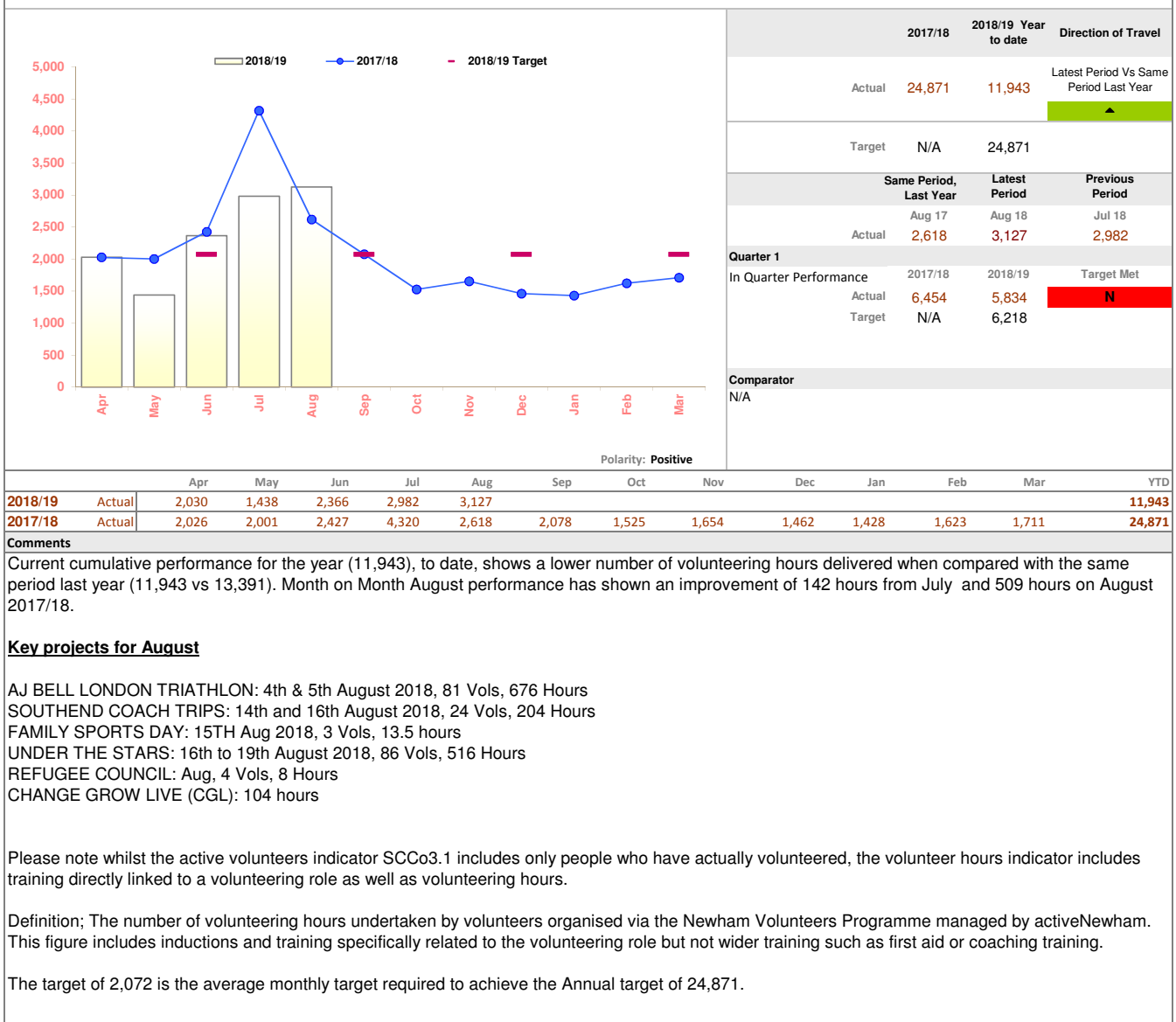


## Number of Active Volunteers

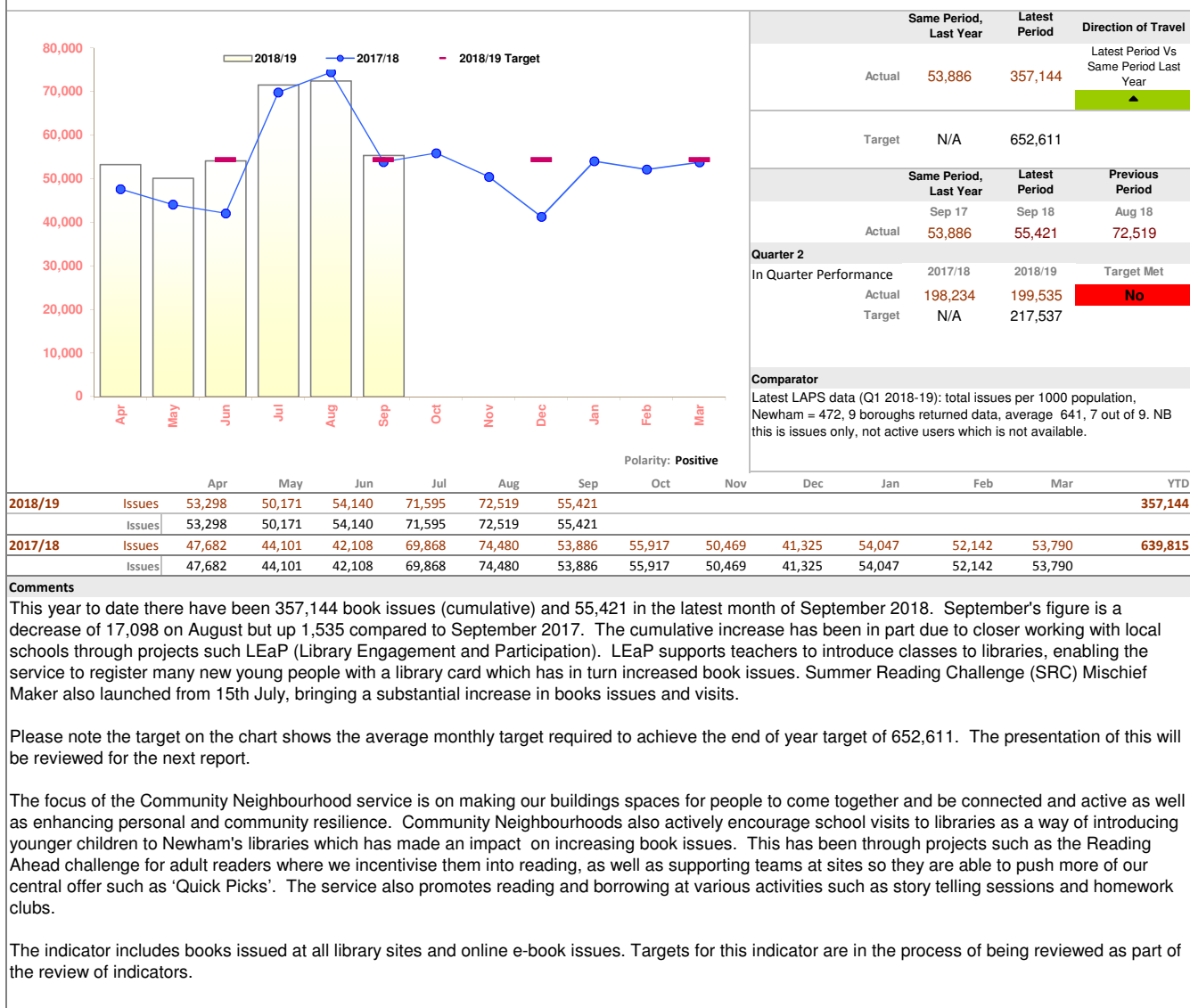
The number of individuals enrolled on the Newham Volunteers Scheme (currently commissioned to activeNewham) who have volunteered since April ( 1 month in arrears).



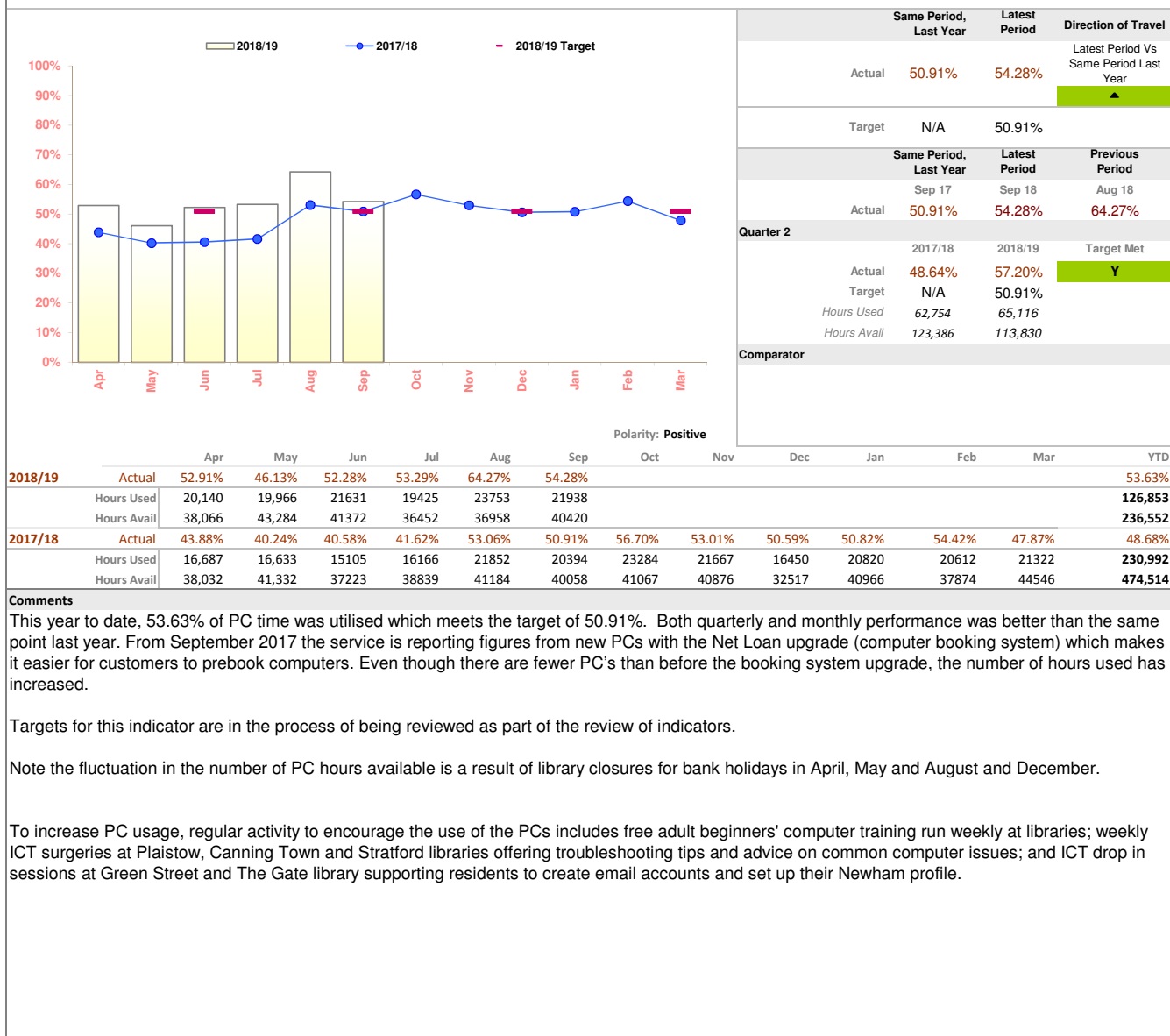
Volunteer Hours though Newham Volunteering Programme (currently commissioned to activeNewham)  
1 month in arrears)



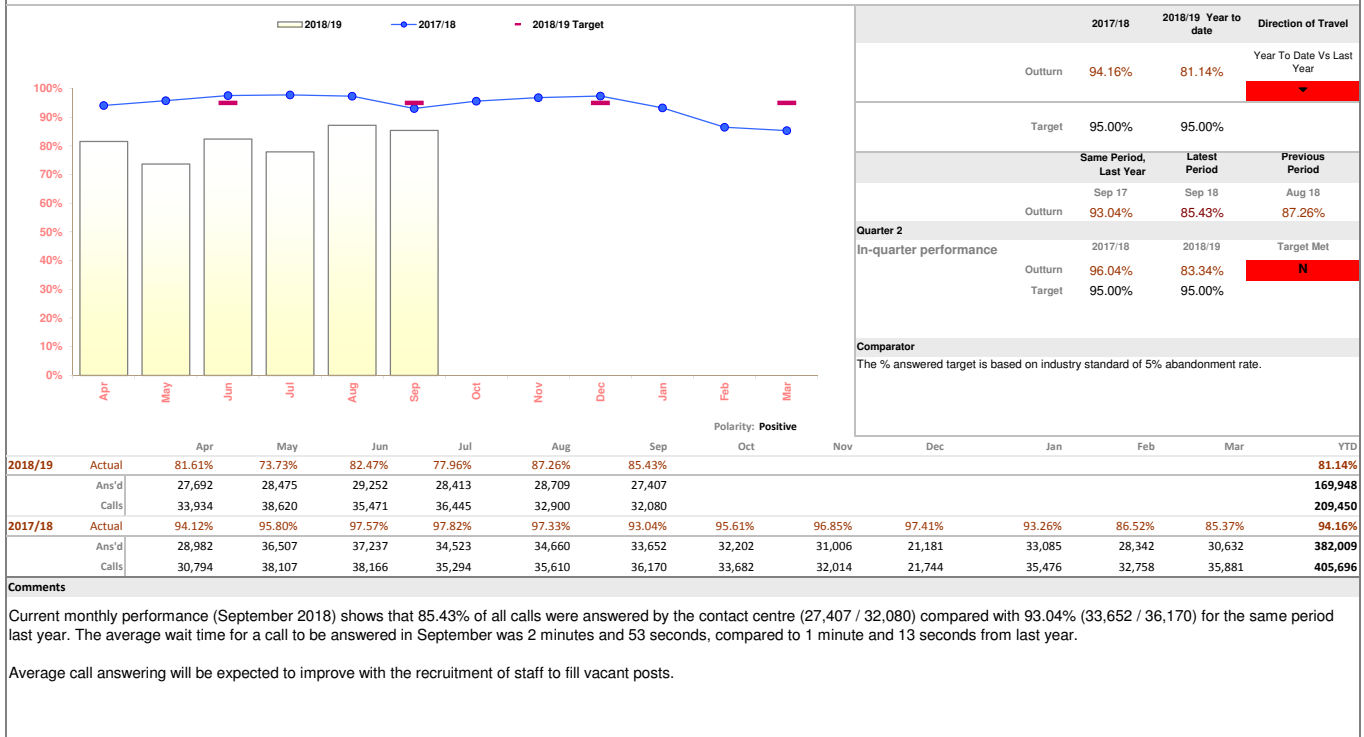
## Total book issues.



## % of time library PCs are utilised



## Percentage of Calls Answered by Corporate Contact Centre (Customer Services).



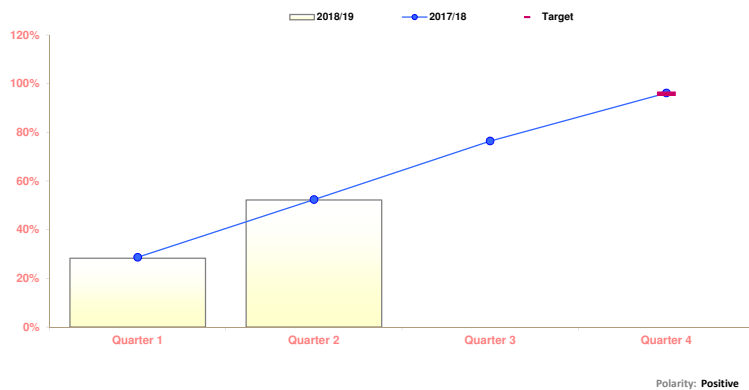
## Percentage of Calls Answered by Council Tax &amp; Benefits Contact Centre



## CETo9.1

## Percentage of council tax collected

## Cumulative indicator



	2017/18	2018/19 Year to date	Direction of Travel
Actual	96.12%	52.17%	Latest Period Vs Same Period Last Year
Target	95.80%	95.80%	
Quarter 2			
	2017/18	2018/19	
Actual	52.35%	52.17%	
Payment (£)	49,737,501	52,439,709	
Actual/Base (£)	95,008,956	100,512,788	
Target	See commentary		
Comparator			
Local PI - no comparator			

Quarter	Quarter 1	Quarter 2	Quarter 3	Quarter 4
2018/19				
Newham	28.29%	52.17%		
Cash (£)	28,182,609	52,439,709		
Base (£)	99,622,115	100,512,788		
2017/18				
Newham	28.63%	52.35%	76.42%	96.12%
Cash (£)	26,971,084	49,737,501	72,849,066	91,500,884
Base (£)	94,201,921	95,008,956	95,332,746	95,189,698

## Comments

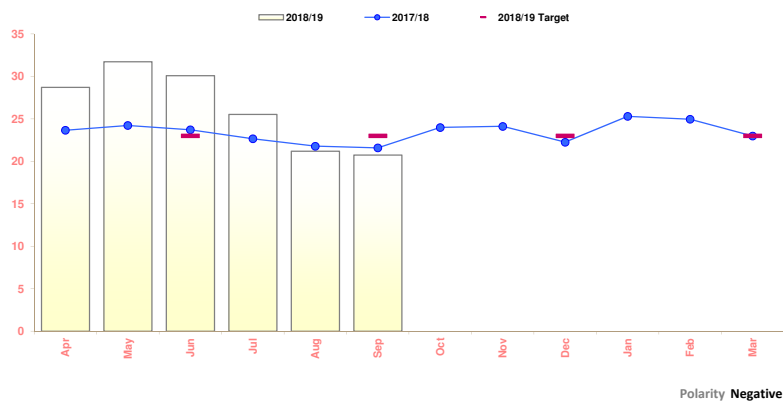
52.17% of council tax had been collected as at the end of quarter 2 2018-19.

The introduction of the welfare reforms in April 2013 resulted in the replacement of Council Tax Benefits with the locally administered Council Tax Reduction (CTR) Scheme. This indicator is made up of both CTR and non-CTR Council Tax collection. With regards to the separate CTR and non-CTR elements, 43.03% of CTR and 53.23% of non-CTR council tax was collected in this period.

Please note that there is an annual collection target for this PI, however, due to the profile of billing across the year, quarterly targets have not been set.

## CETo10.1

## Processing times for Housing Benefits Claims: New Claims



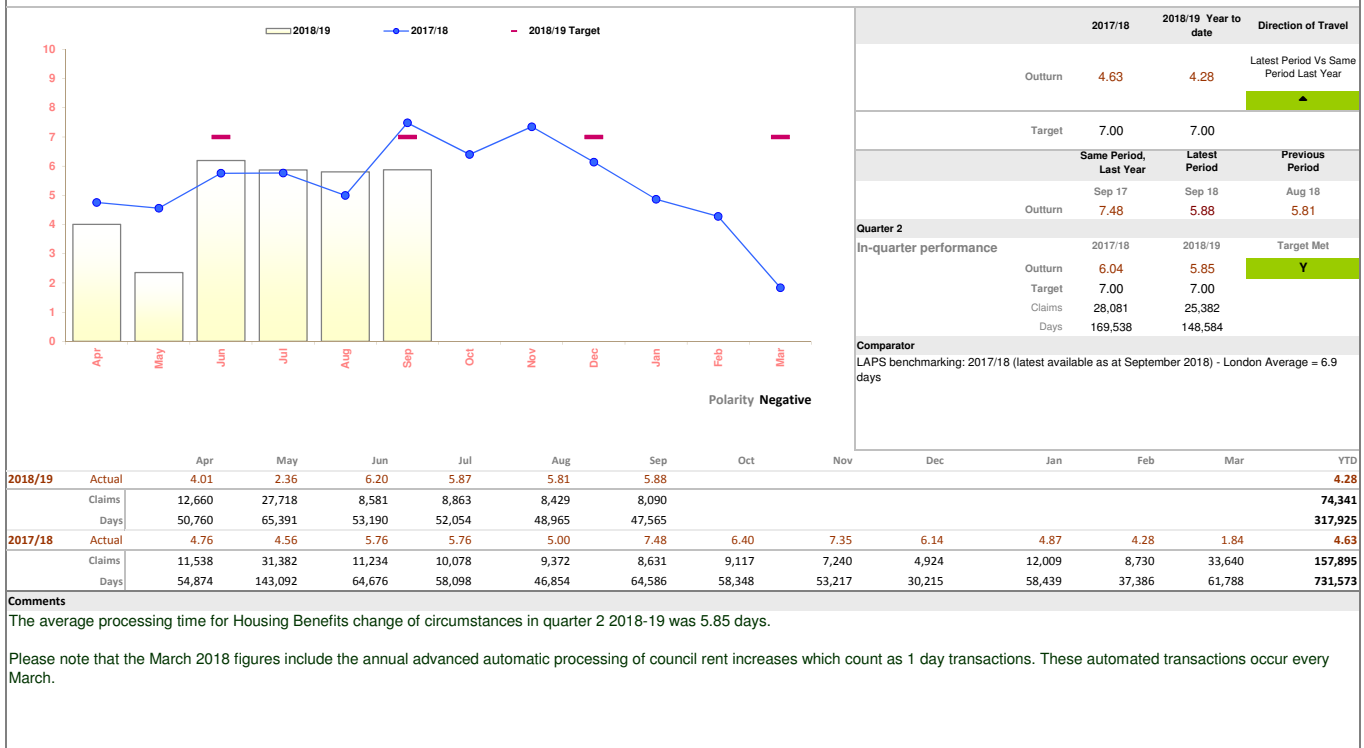
	2017/18	2018/19 Year to date	Direction of Travel
Outturn	23.49	26.59	Year To Date Vs Last Year
Target	23.00	23.00	
Same Period, Last Year			
	Sep 17	Sep 18	Previous Period
Outturn	21.58	20.75	21.20
Quarter 2			
In-quarter performance	2017/18	2018/19	Target Met
Outturn	22.02	22.67	Y
Target	23.00	23.00	
Claims	1,562	1,546	
Days	34,389	35,050	
Comparator			
LAPS benchmarking: 2017/18 (latest available as at September 2018) - London Average = 21.9 days			

		Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2018/19	Actual	28.73	31.75	30.11	25.54	21.20	20.75							26.59
	Claims	494	585	561	571	528	447							3,186
	Days	14,193	18,572	16,890	14,584	11,191	9,275							84,705
2017/18	Actual	23.65	24.22	23.71	22.66	21.78	21.58	23.99	24.12	22.25	25.29	24.96	22.98	23.49
	Claims	437	551	531	541	476	545	540	651	449	583	555	519	6,378
	Days	10,336	13,346	12,592	12,258	10,369	11,762	12,954	15,702	9,992	14,746	13,855	11,926	149,838

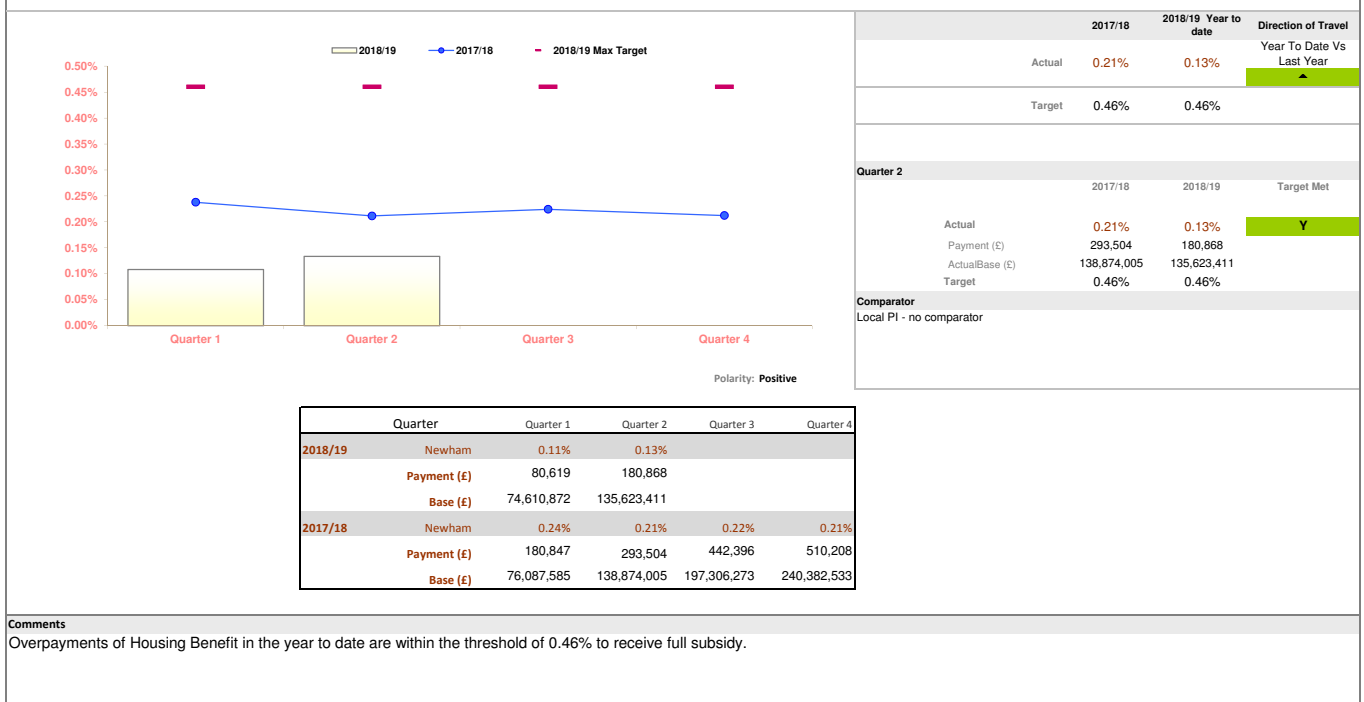
## Comments

The average processing time for new housing benefits claims in quarter 2 2018-19 was 22.67 days. This in-quarter performance was on target. Year to date performance of 26.59 days is not meeting target and processing times are longer than last year.

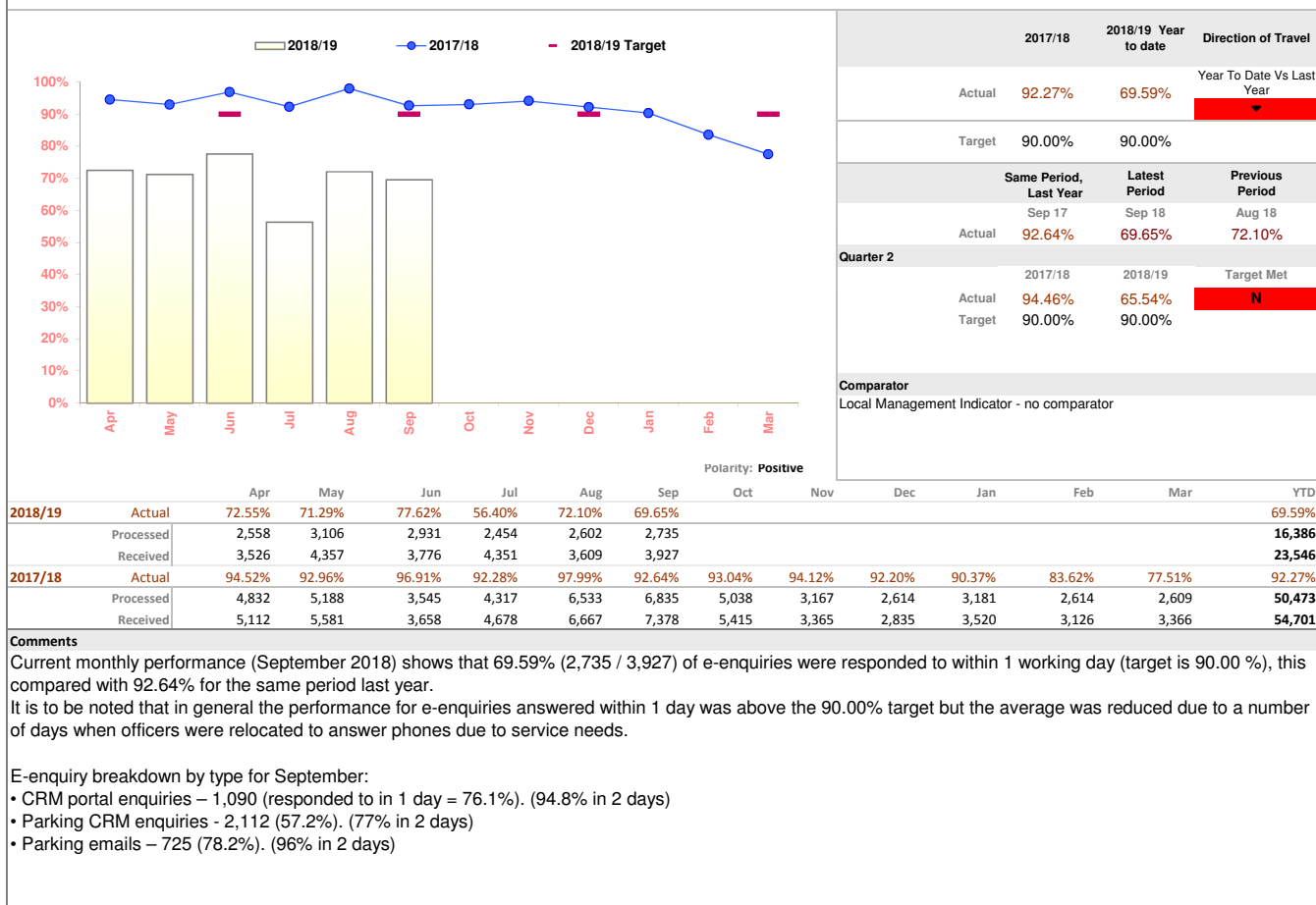
## Processing times for Housing Benefits Claims: Change of Circumstance.



## Overpayments - Local authority (LA) error as a percentage of fully subsidised housing benefit

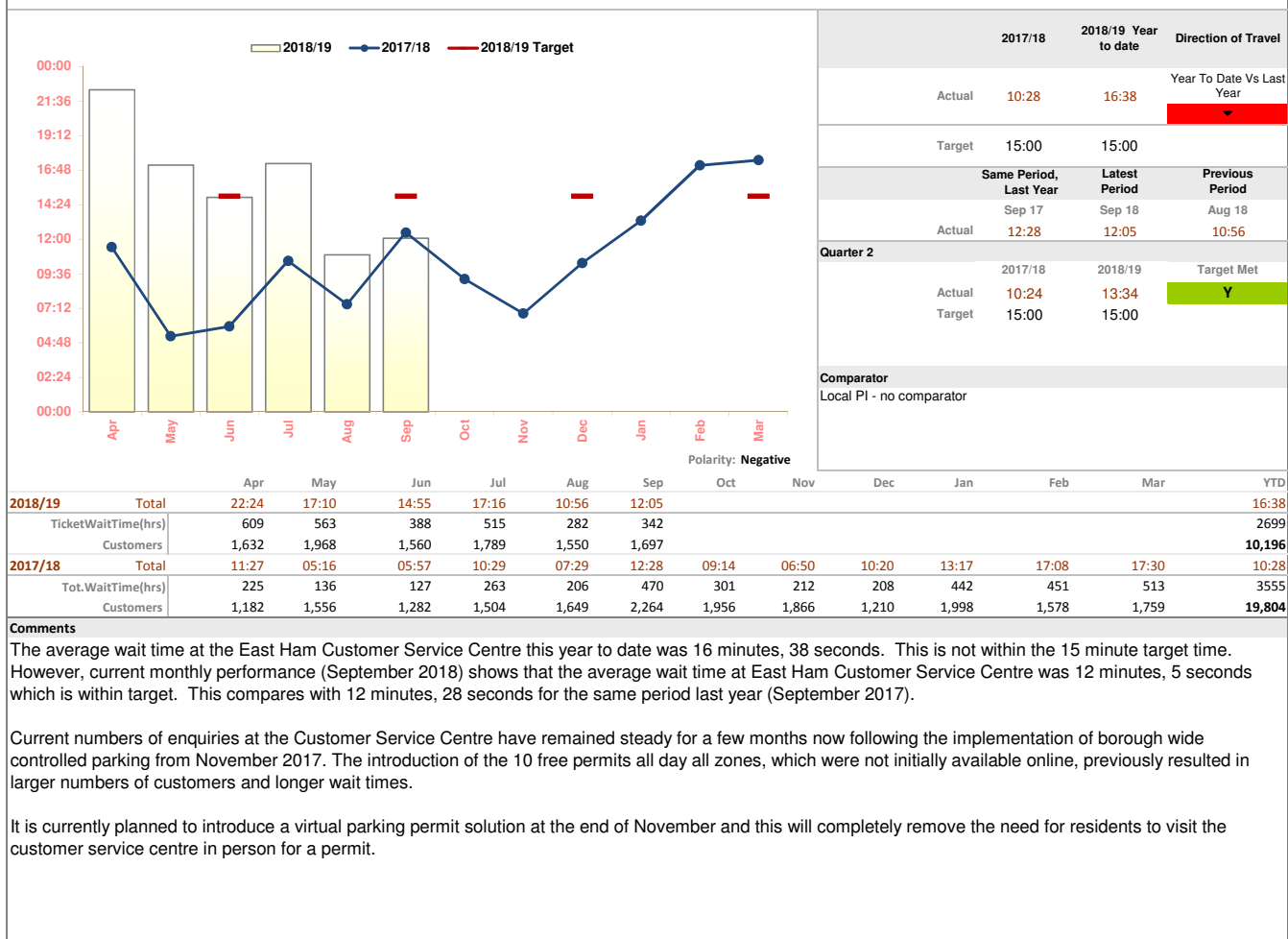


E-enquiries responded to within 1 working day as a percentage of total e-enquiries received.





## Average wait time for a customer in the East Ham Customer Service Centre to see an officer



## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	<b>Provision of residential placements for Looked After Children as part of a sub-regional block contract across 8 North East London Local Authorities</b>	
<b>Date of Meeting</b>	<b>4<sup>th</sup> December 2018</b>	
<b>Lead Officer and contact details</b>	<b>Sam Taylor, Head of Commissioning for Children and Young People's Services</b> <b>Rosie Dei-Boateng, Service Manager, Children's Social Care Commissioning</b>	
<b>Director, Job title</b>	<b>Grainne Siggins, Executive Director - Strategic Commissioning</b>	
<b>Lead Member</b>	<b>Cllr Charlene McLean, Deputy Mayor and Cabinet Member Children &amp; Young People Services, Corporate Parenting and Youth Safety Board</b>	
<b>Key Decision?</b>	Yes	Reasons: 2 or more wards affected
<b>Exempt information &amp; Grounds</b>	No	Grounds: N/A
<b>Wards Affected</b>	All	
<b>Appendices</b>	None	

#### 1 Executive Summary

- 1.1 This report seeks Cabinet's commitment to the Department for Education Innovation programme to implement a new approach to Looked After Children's residential care placements across the North East London sub-region, led by the London Borough of Havering and including seven other boroughs including Newham.
- 1.2 It is anticipated that the Innovation programme, which seeks to implement a block contract for the provision of 35 placements for Looked After Children across the sub-region, will deliver better outcomes for young people, a higher standard of service, a new, innovative commissioning arrangement that can be scaled and spread and the delivery of cost reductions.
- 1.3 This approach is in line with Newham's objectives to improve the quality of care and the value for money of these services and to put residents at the heart of everything we do.

- 1.4 Authority to formalise the commissioning partnership and to enter into the relevant agreements to access the proposed block provision will be sought from Cabinet at the point that these arrangements have been developed.

## **2 Recommendations**

- 2.1 For the reasons set out in the report Cabinet is recommended to:
  - 2.1.1 Provide its commitment to the Department for Education Innovation programme to implement a new approach to Looked After Children's residential care placements across the North East London sub-region, led by the London Borough of Havering and including seven other boroughs including Newham; and
  - 2.1.2 Note the intention to return to Cabinet to seek authority to formalise the commissioning partnership to deliver the programme, and to enter into the relevant agreements to access the proposed block provision.

## **3 Background**

### Statutory responsibilities

- 3.1 A child is looked after by a Local Authority if he or she has been provided with accommodation for a continuous period of more than 24 hours, in the circumstances set out in sections 20 and 21 of the Children Act 1989, or is placed in the care of a Local Authority by virtue of an order made under part IV of the Act.
- 3.2 Local Authorities have a statutory duty to provide suitable accommodation and support for Looked After Children. The duty is contained in section 22 A of the Children Act 1989, which states that where a child is in care of the authority, it is the responsibility of the authority to provide accommodation for that child.
- 3.3 Further, section 20 of the Children Act 1989 sets out duties to provide accommodation for children whose parents are unable to provide suitable accommodation or care. This covers Unaccompanied Asylum Seeking Children and other arrangements where there is no care order in place.
- 3.4 In Newham, 44 Looked After Children are currently accommodated and supported through residential care provision.
- 3.5 As with other boroughs in North East London, placements are sourced on an individual basis through a spot purchasing model. This report proposes a new approach to help improve the quality of these placements for the young people concerned, to put them at the heart of the service provision and to secure best value for the council.

### Local strategic framework

- 3.6 A number of strategies are in place in Newham which set out the direction of travel towards improving the quality of support and accommodation provided for our Looked After Children. These are overseen by the Corporate Parenting Board.
- 3.7 Newham's Looked After Children and Care Leavers' Strategy 2016 – 2020 targets four key outcomes for Looked After Children, all of which are underpinned by the provision of effective accommodation and support including residential care: Health and wellbeing; Learning, progress and achievement; c) Safety and stability; d) Resilience and responsibility.
- 3.8 Newham's Looked After Children Placement Sufficiency Strategy 2016-2019 sets out a commitment to improving outcomes, cost effectiveness, stability and local choice in residential care placements. One of the key routes within the Strategy is priority 7, 'Work with neighbouring Local Authorities to achieve greater regional and sub-regional collaboration and economies of scale'. The proposed approach in this report has been developed as a result.

#### Department for Education Children's Social Care Innovation programme

- 3.9 In order to exercise greater influence in shaping the residential care market and to improve residential care provision, the London Borough of Newham has been collaborating with seven other Local Authorities (Havering, Barking and Dagenham, Tower Hamlets, Waltham Forest, Redbridge, the City of London and Hackney) as part of a Department for Education (DfE) funded Children's Social Care Innovation programme to implement a sub-regional approach to commissioning residential care.
- 3.10 DfE have made available £782,750 (with a further £53,000 dependent upon satisfactory evaluation of the project) as funding to support this programme. The London Borough of Havering is the lead Authority and holds the funds on behalf of the participating boroughs.
- 3.11 Directors of Children's Services from all eight Local Authorities formally committed to the Innovation programme in May 2017. Cabinet-level commitment is now being sought to the proposed approach, in preparation for future Cabinet decisions to formalise the partnership and enter into the relevant agreements to access the new provision.
- 3.12 The current challenges in commissioning residential care provision and the benefits of the proposed new approach to sub-regional commissioning are set out below.

#### Current approach to residential care placements in Newham and North East London

- 3.13 In working with neighbouring Local Authorities and in order to improve the current arrangements for the provision of residential care for Looked After Children, the key challenges across the sub-region have been identified.

Namely, these are:

- Placement instability and unsuitability
- Variable quality
- Value for money
- Relationships with providers
- Inefficient commissioning arrangements

- 3.14 **Instability and unsuitability** – Young people in residential care from across the sub-region have expressed feelings that residential placements are ‘done to’ them, and that they do not feel their views are always considered about placement options. Young people who are placed outside of their community often express feelings of isolation and loneliness as it is difficult to maintain meaningful relationships with their family network, peer group and professional network. These feelings often lead young people to go missing from their placement which often raises the risk of sexual exploitation. Such placements, arranged without planning, are often unstable with mixed outcomes.
- 3.15 **Variable quality** – Both commissioners and young people in the sub-region report a variance in quality between residential providers. Young people are often placed outside of their communities due to a lack of quality and lack of capacity in the local provision. Individual Local Authorities do not currently have sufficient influence in the market to drive standards across all providers.
- 3.16 **Value for money** - All eight of the Local Authorities across the Partnership currently spot purchase residential placements. Spot purchasing occurs on a case-by-case basis and often results in Local Authorities within the sub-region competing against each other for limited placements with trusted providers. This in turn drives up the price over time. The average residential placement cost for each Local Authority in Northeast London varies; however, each Local Authority in the Partnership has seen an increase in the average residential placement cost over the past two years.
- 3.17 **Relationships with providers** – The current commissioning framework in North East London does not create a platform for developing lasting and meaningful relationships between Local Authorities and providers. Due to high demand and limited supply, commissioning teams spend most of their time finding placements and not undertaking a proactive market management approach with providers to help support their business development and delivery of improved outcomes for young people.
- 3.18 **Duplication of brokerage arrangements** - Each Local Authority has their own team or specific officers who are in charge of identifying residential placements and matching young people. It is not uncommon for a placement officer to call upwards of 100 residential providers before finding a provider who can and is willing to accept a young person. The time spent identifying placements and matching is significant and this is occurring in each Local Authority. This process is resource intensive and creates significant duplication across the sub-region as officers from different Local Authorities are calling the same providers.

3.19 Engagement with young people in residential care has been carried out in order to identify the necessary improvements to their provision. Young people have stated they:

- Do not like being placed outside of their communities
- Want more support to maintain good relationships because isolation and loneliness is common
- Would like more services to be available as they transition to adulthood
- Want more input and more choice about where they are placed and where they live
- Want a clearer and easier care system to navigate
- Would like more support to return home

#### **4 Key Considerations & Proposals**

##### Proposed approach to residential care placements in Newham and North East London

- 4.1 In response to the challenges outlined above and in order to deliver against the stated wishes of young people in residential care, it is proposed the sub-region works as a partnership to create a block provision of residential care for Looked After Children.
- 4.2 The London Borough of Havering, as the lead for the Innovation programme, will initiate a tender for the procurement of a block provision of 35 Looked After Children (LAC) residential placements within the geographical footprint of North East London over eight years with a contract duration of four years and two two-year extensions.
- 4.3 It is proposed that each participating Local Authority excluding the City of London will purchase 5 individual placements from this block provision. Authority to enter into this arrangement will be sought from Cabinet at the point of mobilisation through an inter-authority agreement (IAA).
- 4.4 Placing children and young people nearer to their home communities in provision where high quality is assured will deliver an improved lived experience and outcomes for children in residential care.
- 4.5 The proposed provision is expected to deliver a range of quality improvements:
- 4.6 **Focus on quality** – Quality in the commissioned provision will be achieved through strong collaborative contract management assurance of the providers by participating Local Authorities. Furthermore, it will be supported by the provision of workforce development opportunities through the programme. Residential staff will be trained in foundation level systemic practice, an evidence-based model that has proven effective in children's services and residential settings across Britain. A detailed workforce development offer will be implemented for residential care staff, funded from the innovation grant.
- 4.7 **Three-way co-production** – As well as drawing heavily on the views of

children and young people, the proposed programme will expand the concept of co-production to include the residential provider. It is expected that developing an equitable relationship between the commissioners, young people, and the provider will go a long way in breaking down barriers in the current approach.

- 4.8 **Improved data** - The evaluation and evidence collated through the commissioned provision will enrich the boroughs' understanding of the lived experience of young people in residential care and this will be fed back into the wider commissioning cycle.
- 4.9 **Improved market management** – By coming together as a sub-region, individual Local Authorities will be able to exercise more influence over the local provider market. In addition to the block contract, there will be the opportunity to organise further provider forums for the sub-region and to consider opening the workforce development programme to other providers.
- 4.10 **A platform to build upon for the improved sub-regional commissioning of other children's social care services** – If the block provision is successful, there will be momentum across the sub-region to explore improvements to commissioning in other areas of children's social care such as independent fostering or semi-independent accommodation.
- 4.11 **An improved contracting approach** – The approach to contracting will be based on block contracts with providers and payment-by-results clauses to incentivise quality and positive outcomes for young people. A longer-term block contract with providers will create a period of time where meaningful and lasting relationships can be developed. The intention is to include payment-by-innovation clauses to incentivise the providers to strive for continued improvement based on positive outcomes for young people, such as representation in Education, Employment, and Training, sustainable step-downs from residential care, and placement stability
- 4.12 **Scaling and spreading innovation** - The proposed approach will provide a blueprint for future sub-regional ventures in other parts of the country. In order to support the dissemination of learning outside of the North East London sub-region, a toolkit will be produced to support other Local Authorities to establish the programme in their area.

#### Financial benefits

- 4.13 A detailed needs analysis and savings model has been developed for Newham (see associated approved Checkpoint report) to ensure the block provision meets the needs of our Looked After Children and offers best value.
- 4.14 It is anticipated that the purchase of 5 individual placements within the block provision will cost each Local Authority up to £650,000 per year.
- 4.15 According to an indicative model this would deliver an annual cost reduction of £161,694 based on moving existing young people in placement once the contract is fully operational.

- 4.16 A robust cost saving model will be established at the time of the mobilisation of the provision.
- 4.17 Placements will not be at 100 percent occupancy from the outset of the contract. The London Borough of Newham will identify how many Looked After Children it can transfer into the new placements and the expected timescales through which the Council can move towards 100% occupancy.
- 4.18 The contract will allow Newham only to pay for the used beds during the scale up to 100% in the first year of the contract.
- 4.19 Placements into the new provision will be managed and quality assured by the London Borough of Havering's Looked After Children Brokerage Team. The additional resource required to expand the Havering team's capacity will be funded by the Innovations grant for the first 3 years.
- 4.20 Thereafter the seven participating Local Authorities in North East London will need to negotiate their contributions to the central brokerage function. It is estimated this cost will amount to £10,000 per annum per Local Authority. Other Local Authorities 'spot-purchasing' from within the block would be charged a fee which would also contribute to administration costs.
- 4.21 Contributions to brokerage will be funded from the realised savings. If the savings prove substantial, Newham may wish to consider expanding the number of beds commissioned through the block.
- 4.22 The proposed block provision will commission different levels of support. There will be a fixed price per placement for basic requirements and a sliding scale of costs for more specialist support over and above the basic. There will be an expectation that the specialist costs will reduce as the young people progress along their care plan.

#### Mitigations and the management of risk

- 4.23 The primary risk associated with any block contract is under occupancy.
- 4.24 In the proposed model, the financial risk of vacancies sits with the Local Authorities not the provider.
- 4.25 However, this is not considered to be a high risk as most Local Authorities in the Partnership have stated they could fill their allocated five places multiple times.
- 4.26 Newham has the highest number of placements of any of the authorities in the North East London sub-region, currently at 44. This will mitigate the risk of voids and a detailed needs analysis of existing young people in residential care has identified a cohort of up to 11 who could be eligible for the new provision.
- 4.27 In addition to this the risk can also be mitigated by careful contract management to ensure that:



- There is a cohort of suitable placements available to transfer into the new provision;
- Only places that can be filled are commissioned initially and gradually increased up to 35 as and when they are required.

4.28 It is proposed an internal market will be developed between the Local Authorities enabling vacant placements allocated to one authority to be purchased by another authority. It will also be possible to 'sell' placements to boroughs outside the sub-region.

4.29 Finally, work is currently being undertaken to establish a robust contract governance that will provide further mitigation to any risk of voids and enable the delivery of the financial benefits.

#### Specification

4.30 The sub-region has undertaken a comprehensive six-month co-production/market stimulation exercise to ascertain the needs of Looked After Children and the views of providers. Over 120 providers have been included in the co-production of the contract specification. Key aspects of the specification have been set out below:

#### **4.31 Outcomes**

- Improved placement stability measured by the Stability Index and number of placement breakdowns
- Improved placement suitability measured by in-placement interviews with young people and the number of unplanned placement moves
- An increase in the number of young people placed through this programme in Education Employment or Training
- Increase in young people staying put in residential placements until the age of 21
- Increase in the number of LAC 'stepping down' out of residential care.
- Decrease in unauthorised absence from placement and missing episodes
- Decreased risk of sexual exploitation
- Decrease in the number of engagements with the criminal justice system
- Organisational Aggregated Monitoring. Below is a list of organisational performance indicators we will track through the programme.

#### **4.32 Placement Stability**

- Stability Index (Developed by the Office of the Children's Commissioner)
- Number of placement moves
- Number of unauthorised absences and missing episodes

#### **4.33 Placement Suitability**

- Feedback from young people
- Number of unplanned placement moves
- Wellbeing of young people in residential placements measured through the Strengths and Difficulties Questionnaire

#### **4.34 General Indicators**

- The number of new local placement options within the sub-region
- Improved educational attainment - the percentage of those in care achieving 5 A\*-C for GCSEs
- Staying close – all young people placed in residential care through this programme will be placed within 20 miles of their home authority
- Child Satisfaction measured through surveys
- The number of young people involved in co-production, through membership of the young person's forum and contract management.
- Residential provider satisfaction measured through surveys
- Local Authority satisfaction across the partnership measured through surveys
- The number of young people engaged with community professionals, i.e. Child and Adolescent Mental Health Services and health providers

#### **4.35 Individual Child Outcome Monitoring**

- The Partnership will also be monitoring individual children's progress towards their personal targets. This will be accomplished using:
- Care plans
- Stepdown plans
- Personal education plans

#### **4.36 Financial Monitoring**

- Average weekly cost of residential placements inside of the Partnership's geographical footprint, compared to the cost outside of the footprint
- Average duration of residential placement
- Reduction in overhead cost savings from young people placed less than twenty miles from their originating community
- The number of young people who are sustainably stepped-down from residential placements
- The reduction in overhead costs delivered through smarter commissioning and a centralised approach
- Reduced usage of secure placements

### **5 Policy Implications & Corporate Priorities**

- 5.1 This proposal is guided and underpinned by the principles of the Children's Act 1989, The Children's Homes Regulations and Quality Standards 2014 and the Children and Families Act 2014.
- 5.2 The wellbeing of Looked After Children in the borough, including ensuring that

potentially vulnerable children and young people are safely housed and supported based on their needs, is a fundamental responsibility for the Council, staff and Members. Indeed, this is a responsibility for all Members as corporate parents.

## **6 Alternatives considered**

- 6.1 **Option 1: Do Nothing** - Remain as is, with each Local Authority running separate spot purchasing brokerage systems, a diminished influence over market management and increasing placement costs.
- 6.2 **Option 2: Procure as a single Borough Service** - Going out to market for a Newham-only service would not offer the same opportunities for improved quality, better market management, economies of scale and better pooling of financial risk through an internal market that an eight-borough tender across North East London would offer.

## **7 Consultation**

- 7.1 **Name of Lead Member consulted:** Charlene McLean
- 7.2 **Position:** Deputy Mayor and Cabinet Member Children & Young People Services, Corporate Parenting and Youth Safety Board
- 7.3 **Date:** 8<sup>th</sup> November 2018

## **8 Implications**

### **8.1 Financial Implications**

- 8.1.1 The detailed financial implications of entering into the block provision will be assessed at the time that the provision is being mobilised, following award of the provision by the London Borough of Havering and Newham's commitment to an Inter-Agency Agreement. However, they are likely to include the following:
- 8.1.2 Placements –the initial cost of the placements is based on £2,500 per place/per Week for 5 places this is £650,000 per year and c £5.2m over the 8-year contract lifespan. These are initial estimates based on full occupancy as the cost of the place is dependent on various factors which can only be assessed once tendering bids come through.
- 8.1.3 Based on the above placement cost estimate, Newham can achieve an annual cost reduction of £151,694 based on 90% occupancy of the five committed places – (see Checkpoint report for detailed calculation).
- 8.1.4 There are risks to achieving these cost reductions as the cost of the placement may differ from the estimates based on the quality of the

provisions offered to us, the level of complexity of the children we intend to place, if suitable accommodation is already established or needs to be procured, the cost for these could be factored into the placement cost or there may be a delay in the start time of this block contract until suitable provision is established which would mean the cost savings are deferred.

- 8.1.5 Further risks can be in the form of higher than expected vacancy rates, depending on the needs of the children and their complexity even though Newham have the relevant numbers we may not be able to fully occupy the 5 places in the block contract which would diminish our cost savings. This risk is minimised as there will be flexibility on the contract to offer our place to one of our partner authorities or even to external authorities.
- 8.1.6 It is also likely that at some point during the eight-year contract, if placements are made directly into the block contract rather than being relocated from other areas, the benefits arising will be in the form of cost avoidance rather than savings.
- 8.1.7 There are no additional costs associated with the block contract provision. The Council is currently incurring these costs within its existing cost pressures.
- 8.1.8 The residential placement budget is £9.057m but is forecast to spend £10.403m, a budget pressure of £1.346m. Any cost reduction will reduce the current cost pressure associated with those placements.
- 8.1.9 Brokerage arrangements - in the first 3 years the set up and administration costs associated with brokerage for the residential provision will be funded from the Innovation Grant. The allocation is £782,750 with a further £53,000 dependent upon satisfactory evaluation of the project.
- 8.1.10 Beyond that contributions from all partners will be sought to meet the ongoing administration costs of £70,000 per annum. The Newham contribution of c. £10,000 will be met from savings arising. This is reflected in the saving figure above.
- 8.1.11 This paper is effectively seeking commitment to the strategic direction of the sub-regional commissioning programme. There is no obligation to commit and the proposed provision would need to be assessed at the point of entering into the inter-authority agreement to access the provision to ensure they meet our needs and requirements and deliver the required level of cost reductions.
- 8.1.12 A further paper will be submitted once a suitable provider or consortium of providers is established which will be able to fully describe how the block contract will look and work. At this point it will be possible to fully disclose the expected costs of the contract and the level of cost savings

that can be achieved.

## 8.2 Legal Implications

8.2.1 The statutory framework that permits local authorities to establish shared services, the Local Government Acts 1972 and 2000, the Localism Act 2011 and the Local Authorities (Arrangements for the Discharge of Functions) (England) Regulations 2012 give local authorities the power to arrange for the discharge of their functions by: -

- Another local authority;
- The executive of another local authority;
- a joint committee; or
- one or more officers of the local authorities concerned.

8.2.2 The proposed delegation and commitment to the Department for Education Innovation programme (“**DfEIP**”) as it relates to the future Looked After Children’s Residential Care Placement Service (“**LAC RCPS**”) will be undertaken in accordance with the statutory framework noted in paragraph 8.2.1 above. For clarity, the specifics of proposed the partnership and LAC RCPS, that will oversee the performance and strategic direction of the shared service with operational control executed through a joint management board supervised by a Joint Committee will be the subject of a separate more comprehensive report.

8.2.3 The recommendations in this report is for Cabinet to commit to proposed departmental strategies set out within the body of the report, for the provision of LAC RCPS as permitted by the statutory framework referred to in paragraph 8.2.1. The statutory framework allows for a council to delegate one of its functions to another council, as well as allowing two or more councils to discharge their functions jointly by way of establishment of a joint committee. Joint committees can in turn delegate functions to one or more officers of the councils concerned. Decisions of the joint committees are binding on the participating councils. However, subject to the terms of the arrangement the council retains the ability to discharge the function itself.

8.2.4 In accordance with Newham’s Contract Standing Order 26.2 the Director of Legal and Governance and Head of Procurement will be informed of the proposal to determine the legal, governance and procurement implications before proceeding and/or seeking approval of the Cabinet. The formal collaboration or inter-authority agreement with Havering and other named partners will set out the respective duties and liabilities of the three parties in relation to the proposed arrangements.

8.2.5 The delegation will be undertaken in accordance with the statutory framework through the inter-authority agreement (IAA) or collaboration agreement which will set out the governance framework under which the LAC RCPS will operate. It will therefore include: roles, responsibilities, relationship and governance of the shared service partners, financial principles and service details.

### **8.3 Equalities Implications**

- 8.3.1 The service will impact on Looked After Children. The service will contribute towards improved quality and reduced levels of placement disruption for those children in care.
- 8.3.2 Improved service provision will enable children and young people to be safeguarded while being housed and allows them to experience services within the community in a safe way, thereby, contributing to positive life chances, educational and social development.

## **9 Background Information used in the preparation of this report**

- 9.1 Project documentation for the Department for Education Innovation programme for the North East London sub-regional commissioning of residential care for Looked After Children
- 9.2 Checkpoint report - North East London sub-regional commissioning of residential care for Looked After Children

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## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	Expansion of Brampton Manor Academy	
<b>Date of Meeting</b>	4 <sup>th</sup> December 2018	
<b>Lead Officer and contact details</b>	<p>Name: Treena Lyons / Zoe Power</p> <p>Job Title: Capital Programme Manager (Basic Need)</p> <p>External Telephone Number: 0203 3739567 / 37263</p> <p>Email address : <a href="mailto:treena.lyons@onesource.co.uk">treena.lyons@onesource.co.uk</a> / <a href="mailto:zoe.power@onesource.co.uk">zoe.power@onesource.co.uk</a></p>	
<b>Director</b>	<p>Name: Sarah Chaudhry</p> <p>Job Title: Director of Asset Management</p> <p>External Telephone Number: 01708 433089</p> <p>E-mail Address: <a href="mailto:sarah.chaudhry@onesource.co.uk">sarah.chaudhry@onesource.co.uk</a></p> <p>Name: Grainne Siggins</p> <p>Job Title: Executive Director Strategic Commissioning</p> <p>External Telephone Number: 020 3373 8035</p> <p>E-mail Address: <a href="mailto:grainne.siggins@newham.gov.uk">grainne.siggins@newham.gov.uk</a></p>	
<b>Lead Member</b>	Cllr Julianne Marriott, Cabinet member, Education	
<b>Key Decision?</b>	Yes	Reason: Involves expenditure or savings of £500,000 or more.
<b>Exempt information &amp; Grounds</b>	No	N/A
<b>Wards Affected</b>	Brampton Manor is located in East Ham South Ward. Children attending the school come from across the whole Borough and the need to provide additional Secondary School places affects the whole Borough and therefore all wards are affected.	
<b>Appendices (if any)</b>	1.Equality Impact Assessment	



## **1 Executive Summary**

- 1.1 This report seeks approval from Cabinet to appoint Neilcott Construction Ltd to deliver a construction project to expand Brampton Manor Academy, part of the Brampton Manor Trust, by four forms of entry (4FE) in order to meet forecast demand for school places.
- 1.2 The report also seeks approval from Cabinet for the Council to enter into a Development Agreement with Brampton Manor Trust relating to the proposed expansion.
- 1.3 The report also seeks approval to delegate agreement of the detailed terms of the contract to the Executive Director Strategic Commissioning.

## **2 Recommendations**

- 2.1 For the reasons set out in the report and its appendices Cabinet is requested to:
  - 2.1.1 Agree to enter into a Development Agreement with Brampton Manor Trust, relating to the delivery of the above contract and provision of places at the school.
  - 2.1.2 Accept the recommendations set out in the report to award a contract to Neilcott Construction Ltd in the sum of £21,526,248 as set out in para 4.2 of this report.
  - 2.1.3 Authorise the Executive Director Strategic Commissioning, following consultation with the Directors of Asset Management, Financial Sustainability and Legal and Governance, to agree the detailed terms of the contract, subject to the contract being delivered in accordance with a valid planning permission and within the total budget available.
  - 2.1.4 Agree to award an enabling works contract to Neilcott Construction Ltd as set out at para 4.3 of this report.

## **3 Background**

- 3.1 The expansion of Brampton Manor Academy is included in the education capital programme agreed by Cabinet, most recently in February 2018, with a budget of £23,747,649.
- 3.2 Approval was secured at Mayoral Proceedings on 25<sup>th</sup> May 2017 to commence a procurement exercise for a construction project at Brampton Manor Academy. This approval included delegated authority to the relevant Director, in consultation with the lead Cabinet Member, to enter into enabling works contracts. In accordance with this decision, procurement of the construction services has taken place via the East London Solutions (ELS) schools and public buildings framework for projects over £10million value. (The ELS framework is a pre-tendered procurement framework led by Barking and Dagenham and covering the London Boroughs of Havering, Redbridge, Newham, Tower Hamlets, Waltham Forest, Bexley, Greenwich, Lewisham,

Enfield and Hackney. There are six companies on this part of the framework, which operates through a mini competition process, with the successful companies on the Framework being invited to tender on the basis of cost and quality offered for the contract to be performed.)

- 3.3 All six companies on the ELS framework were invited to tender for the Brampton Manor Academy expansion project, including taking part in an e-auction. The e-auction enables potential suppliers to compete with each other by gradually reducing their prices during the e-auction in order to win the contract. Tenders have been invited, returned and evaluated. In line with the framework the companies were invited to return tender submissions setting out prices for their design and management of the project and contract preliminaries. Two companies submitted tender returns. Four companies declined to submit a tender. The results of the tender exercise, following the e-auction, were as follows:

<b>Tender returns (winner first)</b>	<b>Price (Initial Design and Management only)</b>	<b>Cost Score</b>	<b>Quality Score</b>	<b>Overall Score</b>
Neilcott Construction Ltd.	<b>£1,032,984.65</b>	<b>67.02</b>	<b>27.66</b>	<b>94.68</b>
Company 2	<b>£989,003.00</b>	<b>70.0</b>	<b>24.54</b>	<b>94.54</b>
Companies 3 / 4 / 5 / 6	All declined to submit tenders			

## **4 Key considerations &Proposals**

- 4.1 It is proposed to expand Brampton Manor Academy from ten forms of entry (10FE - 1500 pupils) to fourteen forms of entry (14FE - 2100 pupils). The expansion is necessary in order to meet forecast demand for school places. The proposed works will provide additional and improved teaching accommodation to accommodate the additional student numbers at the school, including:
- 4.1.1 Construction of a new dining and classroom block for sixth form students in order to release classrooms in the main building to bring together curriculum areas.
  - 4.1.2 Construction of a new sports hall/gym and dance studio.
  - 4.1.3 A new stand alone year 7 building including all of the curriculum rooms/activities required by Year 7 students.
  - 4.1.4 Extensive works to the playing field, including Multi Use Games Area (MUGA) athletics facilities. (These facilities will also be available for community use after school and during school holiday periods.)
  - 4.1.5 A new arrival entrance to link the new build to the existing facilities.
  - 4.1.6 Internal refurbishment to the existing school to increase the size of the current staff room and library to accommodate the increase in numbers of both staff and students.
- 4.2 The highest scoring tender from Neilcott Construction Ltd has been reviewed and found to be compliant in all respects. Neilcott Construction Ltd have been working with officers, the scheme architect and school

stakeholders to develop a fully detailed and costed Stage 2 submission. A planning application for the proposed development is scheduled to be considered by Strategic Development Committee on 15<sup>th</sup> January 2019 and the proposed contract will only proceed with the benefit of planning permission. Based on the current proposed scheme, the contract sum has been confirmed at £21,526,248. The tender price is considered to offer value for money for the Council and Cabinet is recommended to agree to let the contract to Neilcott Construction Ltd.

- 4.3 Early works packages have been agreed and implemented on site to date, with a total cost of £602,729, which will be subsumed into the main contract sum. These were agreed by the Executive Director Strategic Commissioning as an officer key decision on 9/10/2017. Approval is sought from Cabinet to enter into a further enabling works contract pending consideration of the scheme by Strategic Development Committee (SDC) in order to minimise delay to delivery of the project. (SDC consideration has been delayed awaiting a response from the Department for Education.) Enabling works up to a value of £294,731 are proposed including site set up and placing orders for long-order items. The risks and benefits associated with this approach are set out at section 6 and para 8.4.3 below.
- 4.4 It is proposed that a development agreement will be entered into between the Council and Brampton Manor Trust in order to ensure that both the Council's and the school's requirements are fully met in terms of provision of pupil places and of additional accommodation and facilities.

## 5 Policy Implications & Corporate Priorities

- 5.1 The proposed expansion will assist sustained and continued improvements in education, including for pupils with special education needs and will ensure that there are sufficient places available at all levels of education.
- 5.2 The school premises is open for use by pupils and staff and by the community outside the school day, for sports and fitness and wellbeing activities. A Community Use Agreement will be entered into, related to the grant of planning permission for the scheme, which will result in increased facilities available for community sports and fitness use.
- 5.3 Brampton Manor Academy converted to Academy Status on 1<sup>st</sup> April 2011 as founder member of the Brampton Manor Trust. The Trust now also includes Langdon Academy which converted to Academy Status on 1<sup>st</sup> April 2014.

## 6 Alternatives considered

Alternative Option:	Comment:
Do not provide additional places.	The Council has a statutory duty to provide sufficient places and forecasts indicate that these places are required.
Provide additional places at another school.	Brampton Manor Academy was selected for expansion based on: <ul style="list-style-type: none"> <li>a feasibility study of the site and premises;</li> <li>assessment of its management / organisational capacity to expand and provide high quality education to current and new students;</li> </ul>

	<ul style="list-style-type: none"> <li>• agreement of the Regional Schools Commissioner to the expansion following consultation with schools and others;</li> <li>• open admissions policy, it is a co-ed school and so can offer places to all.</li> </ul> <p>The proposal is now well advanced and pursuing an alternative site would result in considerable delay. However, further expansions will be required to meet forecast demand and these will be considered at other school sites.</p>
Provide places at a new school.	Land availability to build a new school is limited and would need to be identified. All new schools must be Free School Academies. A sponsor would need to be identified.
Different space configuration to achieve expansion.	<p>Different options have been considered including redeveloping the existing building however this was considered not viable for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The structure does not lend itself to a further floor without substantial structural works;</li> <li>2. The width of the existing corridors and circulation space is insufficient for the proposed increase in student numbers.</li> <li>3. Students would need to be decanted into temporary classrooms whilst the works were being carried out which would incur further costs /time and disruption.</li> </ol> <p>The stand alone year 7 block proposed will be beneficial to curriculum delivery for these students and welcome them into a secondary school environment without the overwhelming experience of being on a large campus.</p>
Do not implement enabling works in advance of planning permission.	This option has been considered but, on the balance of risks is not recommended. If the enabling works package is not implemented without delay there will be a delay to the completion of the school expansion. (Places are due to be delivered and are required in order to meet the Council's statutory obligations as follows: Sept 2019: 3FE; Sept 2010: 1FE.) Risks associated with grant of planning permission and project delay are set out at para 8.4.3 of this report.

## 7 Consultation

- 7.1 Cllr Julianne Marriott, Cabinet Member for Education has been consulted on this report.
- 7.2 The proposed scheme has been developed in consultation with Brampton Manor Academy. The school is supportive of the proposed scheme.

## 8 Implications

### 8.1 Financial Implications

- 8.1.1 The cost of the project can be met in full from funds within the Education Capital Programme (including s106 funds and Basic Need programme contingency) and there will be no impact on General Fund capital.

Costs		
Enabling Works Package (including pre-construction design) agreed 9 <sup>th</sup> October 2017	<b>£602,729</b>	Subsumed into main contract
Further Enabling Works Package proposed	<b>£294,731</b>	Subsumed into main contract

Main Contract Sum (Neilcott Construction Ltd.)	<b>£21,526,248</b>
Misc. Costs. (inc fees and charges)	<b>£2,221,401</b>
<b>Total Gross Costs</b>	<b>£23,747,649</b>
<b>Funding</b>	
Basic Need Capital	£23,000,000
Education s106 monies	£747,649
<b>Total Funding included within the approved Capital Programme</b>	<b>£23,747,649</b>

8.1.2 The revenue costs associated with a larger school and additional pupils will be met directly by the Academy.

## 8.2 Legal Implications

8.2.1 This report seeks approval of the Cabinet for the award of Neilcott Construction Ltd to undertake both the enabling works and the construction works to expand Brampton Manor Academy, and to delegate the settlement of the contract to the persons named in paragraph 2.1.3 of the report. The value of the entire works is set out in the body of the report.

8.2.2 The report states that the commencement of the procurement process was approved at Mayoral Proceedings on the 25<sup>th</sup> May 2017 and part of the enabling work approved on the 9<sup>th</sup> October 2017.

8.2.3 The Council is a Local Authority within the meaning of Section 12 of the Education Act 1996 and under Section 14 whereby the Council must ensure that there are sufficient schools for providing primary and secondary education in its area.

8.2.4 All public works contract in excess of £4,551,413 have to be tendered in compliance with the Public Contracts Regulations Act 2015 ('Regulations'). Compliance with the Regulations can be by appointing a contractor from a Framework established under section 33 of the Regulations. 35(5) a of the Regulation permit the use of e auctions where the procurement documents can be established with precision - on the reopening of competition among the parties to a framework agreement. The report states that Neilcott Constructions was appointed by the Council to undertake the remainder of the enabling works and the construction works under the East London Solutions (ELS) Framework. The Procurement department conducted the procurement exercise.

8.2.5 The officer has advised Legal that the Council is the contracting authority for the purposes of the Regulations and will have a direct contractual relationship with Neilcott Construction Ltd. A development agreement between the Council and the school will need to be executed to ensure that the Council and Neilcott Construction Limited will have a licence to enter the school to undertake the works on the school premises.

8.2.6 No final award of the main construction contract should take place until

the Council has obtained the necessary planning approvals, complied with any consultation on the plans to expand the size of the school and where the Council has complied with any necessary conditions of funding from the Department for Education.

8.2.7 Legal Services takes the view that the award subject to fulfilment of the above conditions can proceed if the Council is otherwise satisfied with the content of the report and Legal considers that there is low risk of any successful challenge.

8.2.8 The proposed contract award is consistent with other relevant legislative duties and powers and with corporate strategy.

### **8.3 Equalities Implications**

8.3.1 The Council has a public duty under the Equality Act 2010 to consider the impact of its decisions in terms of promoting and ensuring equality and cohesion across the different types of equality strands: age, sex, ethnicity/race, disability, sexual orientation, religion/belief, transgender and relating to pregnant and breastfeeding women. The statutory duty to provide school places extends to all protected groups.

8.3.2 An Equalities Impact Assessment has been prepared for the project and is attached at Appendix 1 to this report.

### **8.4 Other Implications relevant to this report:**

8.4.1 As this is a relatively small development there are unlikely to be many job opportunities emerging from this contract. However, Neilcott does have a positive track record of working in partnership with Newham's Economic Regeneration Team, placing job opportunities with Workplace (Newham's job brokerage) and alerting local businesses to supply chain opportunities. Therefore, LBN Officers are confident that local economic benefit will be maximised on this proposed contract.

8.4.2 The proposed procurement was considered at Checkpoint on 12<sup>th</sup> November 2018 and the Head of Procurement confirms that the Strategic Procurement Unit will continue to work closely with the service to ensure that this procurement delivers best value for the Council.

8.4.3 Risk: Pending consideration of this application by Strategic Development Committee grant of planning permission for the project cannot be guaranteed. To mitigate this risk the applicant has worked closely with the planning authority through the pre planning and planning application process, including presentations to Members' Forum and Design Review Panel, but some statutory consultee responses remain outstanding. The main construction contract will not be entered into until and unless planning permission is secured and a Development Agreement is signed. However it is proposed to enter into enabling works (not requiring planning permission) of a value under £300,000 in advance of planning permission and there is a financial risk associated with this approach should the project not progress to completion. Should the works be delayed, there may be additional costs associated with acceleration to meet the required programme and/or costs associated with provision of temporary classrooms.

## **9 Background Information used in the preparation of this report**

9.1 Stage 2 submission.

9.2 Checkpoint Panel 12<sup>th</sup> November 2018.

**IF REQUIRED (Only where items were not included on the forward plan):**

**Reason for Urgency:** N/A

## **Equalities Impact Assessment (EQIA)**

### **Brampton Manor Academy: Expansion by Four Forms of Entry (4FE)**

Version number	2
Date last reviewed:	1 <sup>st</sup> November 2018
Approved by:	Zoe Power
Date approved:	22 <sup>nd</sup> November 2018
Next review date:	Spring term (and termly thereafter).
Saved as:	Appendix 1 EQIA Final

### **Management of the EQIA**

Project Manager:	Treena Lyons
School Executive Principal:	Dayo Olukoshi
Architect:	Rivington Street Studio
Contractor:	Neilcott Construction

### **Oversight of the EQIA**

Executive Director Strategic Commissioning:	Grainne Siggins
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### **Introduction**

The aim of equalities monitoring is to demonstrate whether or not the Authority is meeting the needs of all service users / customers to provide services that are not discriminatory to people with different backgrounds and to give an indication of the extent to which the Authority is providing a fair and equal service to all residents.

The Council has a public duty under the Equality Act 2010 to consider the impact of its decisions in terms of promoting and ensuring equality for 'protected' groups. Any specific impact (positive or negative) on a particular group and (if negative) how it will be addressed should be referenced in the EQIA.

The following protected characteristics have been considered in relation to the proposed expansion of Brampton Manor Academy by 4FE.

Protected Characteristic	Reason for this assessment
Disability	Accessibility of buildings and equality of access to learning for students with disabilities.
Socio-economic disadvantage	Reducing socio-economic disadvantage
Age	The school caters for students between 11



	and 18 years olds.
Race	Equality of access to learning for students irrespective of race.
Religion / belief	Equality of access to learning for students of different faiths and no faith
Sex	Equality of access to learning for males and females
Pregnancy and maternity	Equality of access to learning for students during and after pregnancy.
Sexual orientation	Equality of access to learning for students irrespective of sexual orientation
Transgender	Equality of access to learning for Transgender students

### **Scope of the EQIA**

This Equalities Impact Assessment (EqIA) relates to the proposed expansion of Brampton Manor Academy as part of Newham's education capital programme. The proposed works comprise additional spaces to accommodate the extra 4FE requirements, including specific curriculum teaching areas:

- Construction of a new dining and classroom block for sixth form students in order to release classrooms in the main building to bring together curriculum areas.
- Construction of a new sports hall/gym and dance studio.
- A new stand alone year 7 building including all of the curriculum rooms/activities required by Year 7 students.
- Extensive works to the playing field, including Multi Use Games Area (MUGA) athletics facilities. (These facilities will also be available for community use after school and during school holiday periods.)
- A new arrival entrance to link the new build to the existing facilities.
- Internal refurbishment to the existing school to increase the size of the current staff room and library to accommodate the increase in numbers of both staff and students.

Brampton Manor Academy is located in East Ham South Ward with pupils being admitted to the school from more than one ward in the borough. The proposed expansion will help meet demand for secondary school places in East Ham and the rest of Newham

Currently the school is mostly on two levels and has facilities including lifts and accessible WCs.

### **Relevant Data**

The proposed expansion of Brampton Manor Academy is informed by pupil number forecasting.

## **Consultation**

Consultation meetings have taken place with the school stakeholders, residents and Councillors.

The detailed design has been developed by the design team in close consultation with the school stakeholders having regard to equalities and other issues.

Early engagement with building control has taken place to define the scope of the construction project to ensure the new accommodation is accessible and meets building regulations. A planning application has been submitted and is due to be considered by Strategic Development Committee on 15<sup>th</sup> January 2019.

## **Impact on protected groups and recommendations for action.**

The impact of the proposal on each of the protected groups and recommendations for action where appropriate are shown overleaf.

### Assessment of Impact and Recommendations

Protected characteristics / Assessment of Relevance	Issues taken from evidence	Judgement (positive / negative)	Recommendations
Disability  HIGH	<p>The majority of students with SEN are placed in mainstream provision</p> <p>The new provision has been designed to accommodate students with SEND, including DDA compliance. It will be fully accessible and all pupils will be able to access the curriculum.</p> <p>Brampton Manor Academy admits students with SEND.</p> <p>Students with limited mobility, including wheelchair users; students with SEND and visually impaired students may require more time to travel around the school.</p>	Positive	<p>These changes will reduce travel time around the school. This is particularly important for students with limited mobility and other SEND:</p> <ul style="list-style-type: none"> <li>• New dining and classroom block for sixth form students (releasing classrooms in the main building to bring together curriculum areas);</li> <li>• New year 7 building including all of the curriculum rooms / activities required by year 7 students.</li> </ul>
Class /and Socio-economic disadvantage  HIGH	<p>Whilst Newham has moved from 2<sup>nd</sup> most disadvantaged Borough in England to 25<sup>th</sup>, issues of social disadvantage remain.</p> <p>The expansion will create additional spaces at this high performing school, enabling more students to benefit from a high quality secondary education and to go on to apprenticeships / A levels and beyond in order to combat social disadvantage..</p> <p>Sports and fitness facilities within the school provide affordable health and well being opportunities for staff, pupils and the local community outside core hours. , The new facilities will be made available for community use.</p>	Positive	<p>Ensure continued affordable and welcoming access to school facilities outside core hours, including community use.</p>

Cabinet 4<sup>th</sup> December 2018  
Tender Acceptance Report: Expansion of Brampton Manor Academy  
Appendix 1 Equalities Impact Assessment

Protected characteristics / Assessment of Relevance	Issues taken from evidence	Judgement (positive / negative)	Recommendations
Age  HIGH	Newham has large number of young people within the population.  Future population forecasting has been undertaken and will be kept under regular review.	Positive	None: The proposed expansion is part of the Council's proposals to ensure sufficient school places for all school aged children in the Borough.
Race  HIGH	Newham has a diverse population with a large number of ethnic groups represented. The make-up of the population is changing, children arrive part way through their education. The Council is committed to protecting young people from gang related activity, which disproportionately affects black students.	Positive	Increased facilities will be available for the school to continue to offer a wide range of activities for students before and after school core hours.
Religion / Belief  MEDIUM	Newham's diverse population includes people of a wide range of faiths and none.	Neutral	None: Places at Brampton Manor Academy are available and accessible by all sections of the population.
Sex  MEDIUM	Brampton Manor Academy is co-educational. Boys and girls follow the same curriculum and take all lessons together (except PE).	Neutral	None: Places at Brampton Manor Academy are open to boys and girls.
Pregnancy and Maternity LOW	School places are kept available for students to return following childbirth and /or outreach education is offered if appropriate.	Neutral	None specific to the expansion project.
Sexual Orientation LOW Transgender MEDIUM	Guidance is emerging regarding provision for transgender students and will be kept under review.	Neutral  Neutral	Create flexible and adaptable spaces and take account of any accommodation guidelines which may emerge in this regard in future.

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## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	Integrated Advocacy and Independent Mental Health Advocacy (IMHA) Pre-Procurement Report	
<b>Date of Meeting</b>	04.12.2018	
<b>Lead Officer and contact details</b>	Gerry O'Kello, Commissioner – Adults & Health	
<b>Director, Job title</b>	Grainne Siggins, Executive Director of Strategic Commissioning	
<b>Lead Member</b>	Councillor Susan Masters, Cabinet Member - Health and Adult Social Care	
<b>Key Decision?</b>	Yes	Reasons: Procurement of Services covering all wards in borough and total value over £500k (£1,525,00)
<b>Exempt information &amp; Grounds</b>	No	
<b>Wards Affected</b>	All wards	
<b>Appendices (if any)</b>	None	

### 1 Executive Summary

- 1.1 This report seeks approval for the Integrated and Independent Mental Health Advocacy services commissioning plan to deliver the re-procurement and contract award to the successful provider ahead of planned current contract end date of 31 August 2019. New contract to run consecutively.
- 1.2 The provision of Integrated Advocacy and Independent Mental Health Advocacy is a statutory requirement for Local Authorities who have a duty to procure an independent provider to deliver these services to local residents.

### 2 Recommendations

- 2.1 For the reasons set out in the report, Cabinet is recommended to agree:
  - 2.1.1 The procurement of a joint contract to deliver the statutory services of Integrated Advocacy and Independent Mental Health Advocacy by a single provider.

### 3 Background

- 3.1 **Integrated Advocacy** provides focused, time-limited advocacy to individuals across Newham. It supports the principles of Prevention, Personalisation, Partnership,

Protection, Productivity, People as described in ‘*A Vision for Adult Social Care*’ (Dept. of Health 2010). It will support the roll out of ‘*Supporting Lives Connecting Communities*’ – in which advocacy is recognised as a fundamental component which enables people to exercise choice and / or control.

- 3.2 The Advocacy Service meets the council’s statutory requirements as outlined in The Care Act 2014 and The Mental Capacity Act. The service also provides a range of lower level interventions and materials to support those who do not meet the criteria for these statutory services as part of “non-statutory advocacy”. This is because the council also has a duty to provide support to those people who have substantial difficulty in being fully involved in their care and support processes such as assessments and / or review.
- 3.3 The Integrated Advocacy contract is divided into two tiers:
- Tier one: - statutory advocacy (Care Act Advocacy – Independent Mental Capacity Advocate, Relevant Persons Representative and Rule 1.2 (3A) Representative);
  - Tier two: - non-statutory advocacy
- 3.4 ***Independent Mental Health Advocacy (IMHA)*** services support patients who are detained and treated under the Mental Health Act 1983 to understand their treatment options, exercise their rights, and ensure their views and opinions are listen to by NHS practitioners. The service is provided by specialist advocates who are trained to work within the framework of the Act to meet the needs of patients.
- 3.5 The requirement to provide an IMHA service came into effect in England in April 2009, as part of a new statutory provision in the revision to the Mental Health Act 1983 (passed in 2007). Responsibility for commissioning IMHA services originally sat within Primary Care Trusts but this was transferred to local authorities on 31 March 2013 under the Health and Social Care Act 2012.
- 3.6 Both contracts are due to expire on 31 August 2019 and both are currently provided by “Voiceability”.
- 3.7 The current total annual value for the Integrated Advocacy contract is £305,000. This comprises of the “block” to cover the forecasted 7,100hours and a flexible element to accommodate additional unplanned needs. This model has been proven to work well for the current contract in both meeting the forecasted level of need and anticipate any fluctuation or changes in law.
- 3.8 The current value of the IMHA contract is £73,578.08, with approval to retain the full value of £80k to cover any future advocacy procurement costs and the potential projected increase in demand.
- 3.9 The outcome of the services review confirmed that the current provider has consistently responded positively and flexibly throughout the lifetime of the contract and has met and

exceeded contractual requirements. In summary, the review identified that the current services commissioned by LBN are largely working well, and providing a service that is critical to the delivery of the advocacy support wider pathway in the context of projected demand.

#### **4 Proposals and Key Considerations**

- 4.1 Integrated and Independent Mental Health Advocacy services are both statutory services which every Local Authority has an obligation to provide for their residents.
- 4.2 In order to realise efficiencies and improve the delivery of advocacy services in Newham so it can deliver greater flexibility, a clearer pathway and fewer transition points. it is recommended the two services are commissioned as a single contract broken down into 3 tiers: i.e.
  - Tier 1 – Statutory Advocacy (Care Act, IMCA (RPR and Rule 1.2 (3A))
  - Tier 2 – IMHA
  - Tier 3 – Non-statutory advocacy
- 4.3 A new single contract will provide a clearer pathway and fewer transition points between services - e.g. if someone has an IMHA but then comes off a Mental Health Act Section, they could still keep the same advocate rather than having to be transferred to another service and another advocate. This model will provide a single point of contact for all advocacy queries/referrals and provide greater flexibility by enabling greater scope to move resources within the single service at times of increased demand for one type of advocacy provision.
- 4.4 ASC are proposing a competitive tender for a contract period of 5 years (3+1+1) with a break clause in the contract after 3 years to allow a review of the service to be undertaken. This will enable the council to consistently deliver their statutory requirements and reduce unnecessary high short-term procurement costs. The longer length of contract will also encourage provider interest in a narrow and specialised market and establish a medium-term relationship with the provider to facilitate quality and consistency for customers. The tender will be advertised on 'The Official Journal of the European Union (OJEU) and Contracts Finder'.
- 4.5 The maximum annual budget available for this contract is £305,000. To potentially realise efficiencies whilst ensuring that all potential needs are met, bidders will be invited to tender for a block element to cover the forecasted 10,600 hours and a subsidy element to accommodate for additional unplanned needs. This model will meet the forecasted level of need including out of borough cases and anticipate any fluctuation or changes in law. The implementation of the subsidy element has worked well for the current contract and safeguards against escalating costs, out of borough cases and does not over commit LBN to unnecessary block payment. Bidders will need to demonstrate the appropriate staffing level and composition necessary to deliver the Core Service and flexibility to deliver the



subsidy element. The costs for Integrated Advocacy service is funded from the cash limit of Adults Social Care and the IMHA advocacy service is funded from ASC with a top up from the BCF.

- 4.6 The successful provider will be contractually required to demonstrate the delivery of specified outcomes, through individually agreed targets for both statutory services.

## **5 Policy Implications & Corporate Priorities**

- 5.1 The Advocacy Service meets the council's statutory requirements as outlined in The Care Act 2014, The Mental Capacity Act and The Mental Health Act 1983 (passed in 2007). The service also provides a range of lower level interventions and materials to support those who do not meet the criteria for these statutory services as part of a non-statutory advocacy. Advocacy is recognised as a fundamental component which enables people to exercise choice and control.
- 5.2 Advocacy supports the principle of prevention, personalisation, partnership and protection as well as promoting social inclusion, equality and justice. The procurement plan will meet the council's statutory responsibilities and achieve efficiencies through remodelling of current services and a competitive tender process. The service will be open, accessible and locally based in Newham with a high street presence at a central location point, easily accessible with good transport network for all residents in Newham. The service will have required outcomes and Key performance Indicators (KPIs) set out in the specification with regular contract monitoring built in to be managed and monitored by a delegated contract officer. It will therefore contribute to the council priority to deliver high quality, easily accessible and community based mental health services for all age groups and ethnicities.

## **6 Alternatives Considered**

- 6.1 Integrated and Independent Mental Health Advocacy services are statutory services which the Local Authority has an obligation to procure an independent provider to deliver to its local residents.
- 6.2 The commissioning of these service separately was considered, however it can be demonstrated that greater efficiencies and quality of service delivery can be achieved by bringing them into one contract to be delivered by one provider.

## **7 Consultation**

- 7.1 Member Consultation:

**Name of Lead Member consulted:** Cllr Susan Masters

**Position:** Cabinet Member Adults and Health

**Date:** 01.10.2018

## **8 Implications**

### **8.1 Financial Implications**

- 8.1.1 The funding for the procurement contract will be funded from the contracts service, with funding from external ring-fenced Grant, Better Care Funding and Council Base Budget
- 8.1.2 The maximum cost of the contract is expected to be £350k pa. All costs associated to the procurement and contract will be met from within the baseline Adults Social Care Budget.
- 8.1.3 The costs of Integrated Advocacy service is funded from the cash limit of Adults Social Care and the IMHA advocacy service is funded from ASC Budget with additional funding from the Better Care Fund. Any efficiencies identified from the procurement, will help the service to support future years pressures and required savings.
- 8.1.4 Future years budgets are subject to review given the substantial reductions in Local Authority Funding over the next three years. Any commitment against future years' budgets may pre-empt funding decisions that may be required in the context of savings else where in the budget.

### **8.2 Legal Implications**

- 8.2.1 The decision is to firstly authorise the procurement of the contract for the provision of the joint services, namely the Integrated Advocacy services and Independent Mental Health Advocacy services, the intension is for, these services to be undertaken by a single provider. The single contract will be for 3 years with an option to extend for a further 1+1 year.
- 8.2.2 Advocacy services are classified as Light Touch Services and come within Schedule 3 of the Public Contracts Regulations 2015 ('Regulations'). Light Touch Services means the Regulations do not always apply in full. However, as the proposed value of the current services (over the 3 years plus 1+1 year option) will exceed the Light Touch threshold of £615,278, therefore this procurement process will be subject to the Regulations in full. The report indicates that an OJEU notice will be served and a fully compliant competitive process in accordance to the Regulations will be followed.
- 8.2.3 Where the value of the proposed contract exceeds £500,000 or if the decision is one which is likely either to incur significant expenditure, make significant savings or to have a significant impact on those living or working in 2 or more wards then on award of a subsequent contract from this procurement process, that decision will be a key decision which will be subject to a 28 day public notice and it must be on the forward plan.
- 8.2.4 The Transfer of Undertaking Protection of Employment regulations ('TUPE') apply

where a service provision changes from one contractor to a new contractor but the activities being transferred are fundamentally the same as the activities carried out by the previous contractor where TUPE applies employees from the old contractor will be transferred to the new contractor. TUPE information will have to be mentioned in the procurement process. Officers will need to notify the market of the incumbent's providers TUPE information.

8.2.5 Legal services takes the view that the decision can proceed if the council is otherwise satisfied with the content of the report.

### **8.3 Equalities Implications**

8.3.1 An EqlA was completed in September 2018 and concluded that there will be no negative impact on any of the protected groups as a result of the procurement.

8.3.2 Advocacy support services are open to all residents of Newham who lack capacity to be involved in making key decisions about their treatment, accommodation, safeguarding and DOLS. In addition, it also supports those people who have substantial difficulty in being fully involved in key care and support processes such as assessments and or review.

8.3.3 The two services being commissioned will enable the council to ensure equality as both services are fundamentally aimed at reducing inequality and discrimination. In addition, the services will help people to defend and safeguard their rights and have their views and wishes genuinely considered when decisions are being made about their lives. The Care Act 2014, The Mental Capacity Act 2005 and Mental Health Act 1983 (passed 2007) make it clear that support must be provided for people who have difficulty or lack capacity in being involved in any key decisions or process regarding their care and support planning.

8.3.4 Remodelling of the Integrated and Independent Mental Health Advocacy services will enhance the current offer through better co-ordination of services and offer customers a great choice of support and consistency

### **8.4 TUPE and staffing implications**

8.4.1 TUPE implications are set out in paragraph 8.1.4 above

### **8.5 Other Implications relevant to this report:**

8.5.1 Procurement – The Strategic Procurement Unit is working closely with ASC and fully supports the approach being proposed.

8.5.2 Human Resources – no implications to the council as the service is outsourced. Current staff would be applicable to any TUPE implications.

## **9 Background Information used in the preparation of this report**

- 9.1 Integrated and Independent Mental Health Advocacy Commissioning Plan
- 9.2 DMT re-procurement report: Integrated and Independent Mental Health Advocacy service
- 9.3 When related to procurement – Checkpoint Panel Response to “Pre-procurement plan for the provision of Integrated and Independent Mental Health Advocacy service”.
  - 9.3.1 The procurement being proposed has been through the Council’s Checkpoint Gateway Process (pre-procurement), and was recommended to proceed.
  - 9.3.2 The nature of the services being procured would fall within Schedule 3 of the Public Contracts Regulations 2015, and as such, the ‘Light Touch Regime’ would be applicable to this procurement process.
  - 9.3.3 The Strategic Procurement Unit are supporting the service with the procurement to ensure it is undertaken in accordance with the Public Contracts Regulations 2015.

### **Reason for Urgency**

To ensure delivery of a Statutory Service

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## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	Treasury Management 2018/19 Mid Year Report	
<b>Date of Meeting</b>	4 <sup>th</sup> December 2018	
<b>Lead Officer and contact details</b>	<b>Alison Mackie, Treasury Manager</b> <b>0203 373 9833</b> <a href="mailto:Alison.mackie@newham.gov.uk">Alison.mackie@newham.gov.uk</a>	
<b>Director, Job title</b>	Stephen Wild, Head of Pensions and Treasury	
<b>Lead Member</b>	Cllr Terrence Paul, Cabinet Member, Finance	
<b>Key Decision?</b>	Yes / No	Reasons: report for noting
<b>Exempt information &amp; Grounds</b>	Yes / No	Grounds:
<b>Wards Affected</b>	n/a	
<b>Appendices (if any)</b>	1.Prudential Indicators to 30/9/18	

#### 1 Executive Summary

- 1.1 The CIPFA Treasury Management Code of Practice (“the Code”) requires the Director of Financial Sustainability (DFS) to provide a mid year update on the treasury strategy to members of the council

#### 2 Recommendations

- 2.1 Cabinet is asked to note:  
 2.1.1 This Treasury Management 2018/19 Mid Year Report.

#### 3 Background

- 3.1 It is a statutory duty for the council to determine and keep under review how much it can afford to borrow.
- 3.2 The council has signed up to ‘the Code’ which requires that the total capital investment remains with sustainable limits and that the impact upon its future council tax and council rent levels is ‘acceptable’.

3.3 The mid year treasury strategy highlights are presented in table 1 below.

**Table 1: Treasury Strategy highlights**

Number	Key Highlights
1	The capital finance forecast outturn 2018/19 shows a surplus of £5m. Reduced capital spend of £36m to date has both negated the need to borrow and supported higher cash balances
2	Investing in the market rather than the Government's Debt Management facility has generated additional investment income of to end September 2018 of £1.7m
3	The Treasury Management function has 1.6 FTE's with one of the lowest staff costs per million pound managed nationally.
4	Newham is the first of a number of local authorities to issue a High Court claim of misrepresentation in respect of LIBOR manipulation

#### 4 Key Considerations & Proposals

4.1 This mid-year report has been prepared in compliance with 'the Code' and covers:

- Treasury position at 30 September 2018
- Treasury forecast at 30 September 2018
- The economy and interest rate movements
- The council's borrowing strategy and debt strategy
- The council's investment strategy
- The treasury management prudential indicators
- Treasury performance indicators; and
- Regulatory changes.

#### 4.2 Treasury Position

4.2.1 Table 2 details the council's mid year treasury position

**Table 2: Treasury position at 30<sup>th</sup> September 2018**

	Principal Outstanding at 30/09/18 £000	Weighted Average Rate at 30/09/18 %	Weighted Average life at at 30/09/18 yrs
<b>Fixed Debt</b>			
PWLB	207,474	3.14	39.03
Market LOBO	165,000	6.19	44.1
Long Term Market Debt	258,500	5.36	55.23
Mortgages	2		
Temporary	31,500	0.71	0.01
<b>Total Fixed</b>	<b>662,476</b>	<b>4.39</b>	<b>46.92</b>

<b>Total Variable</b>	<b>150,000</b>	<b>7.27</b>	<b>41.34</b>
<b>Total External Debt</b>	<b>812,476</b>	<b>4.9</b>	<b>44.66</b>
<b>Total Investments</b>	- 492,000	1.22	0.72
<b>NET Position</b>	<b>320,476</b>		

#### 4.3 Treasury Forecast

4.3.1 Newham's capital finance budget is a key part of the General Fund's overall budget strategy.

**Table 3: Capital finance estimated outturn 2017/18 September 2018**

	<b>Budget 2018/19 £000</b>	<b>Forecast September 2018/19 £000</b>	<b>Variance 2018/19 £000</b>
<b>Debt Interest</b>	51,691	29,327 -	22,364
<b>Investment Income</b>	- 21,129 -	10,216	10,913
<b>Transfer to Reserves</b>		6,440	6,440
<b>TOTAL*</b>	<b>30,562</b>	<b>25,551 -</b>	<b>5,011</b>

The budget and forecast include external credit income

4.3.2 The revised budget reflects the approved capital programme, includes treasury management investment income and income from commercial activity/external credit. Slippage in the capital programme removed the need to take additional borrowing.

#### 4.4 The economy and interest rate movements

4.4.1 The flow of generally positive economic statistics after the end of the quarter ended 30 June meant that it came as no surprise that the Monetary Policy Committee (MPC) came to a decision on 2 August to make the first increase in Bank Rate above 0.5% since the financial crash, to 0.75%. However, the MPC emphasised again, that future Bank Rate increases would be gradual and would rise to a much lower equilibrium rate, (where monetary policy is neither expansionary or contractionary), than before the crash; indeed they gave a figure for this of around 2.5% in ten years' time but they declined to give a medium term forecast.

4.4.2 The MPC is unlikely to increase Bank Rate in February 2019, ahead of the deadline in March for Brexit. The MPC is more likely to wait until August 2019, than May 2019, before the next increase, to be followed by further increases of 0.25% in May and November 2020 to reach 1.5%. However, the cautious



pace of even these limited increases is dependent on a reasonably orderly Brexit.

#### 4.4.3 Latest interest forecasts are detailed in Table 4 below

Table 4: LINK Asset Services Interest Rate View

Link Asset Services Interest Rate View											
	Sep-18	Dec-18	Mar-19	Jun-19	Sep-19	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21
Bank Rate View	0.75%	0.75%	0.75%	0.75%	1.00%	1.00%	1.00%	1.25%	1.25%	1.50%	1.50%
3 Month LIBID	0.75%	0.80%	0.80%	0.90%	1.10%	1.10%	1.20%	1.40%	1.50%	1.60%	1.60%
6 Month LIBID	0.85%	0.90%	0.90%	1.00%	1.20%	1.20%	1.30%	1.50%	1.60%	1.70%	1.70%
12 Month LIBID	1.00%	1.00%	1.00%	1.10%	1.30%	1.30%	1.40%	1.60%	1.70%	1.80%	1.80%
5yr PWLB Rate	2.00%	2.00%	2.10%	2.20%	2.20%	2.30%	2.30%	2.40%	2.50%	2.50%	2.50%
10yr PWLB Rate	2.40%	2.50%	2.50%	2.60%	2.70%	2.70%	2.80%	2.90%	2.90%	3.00%	3.00%
25yr PWLB Rate	2.80%	2.90%	3.00%	3.10%	3.10%	3.20%	3.30%	3.30%	3.40%	3.50%	3.50%
50yr PWLB Rate	2.60%	2.70%	2.80%	2.90%	2.90%	3.00%	3.10%	3.10%	3.20%	3.30%	3.30%

4.4.4 Where the CFR is positive the council may borrow from the PWLB or the market (external borrowing) or from internal balances on a temporary basis (internal borrowing). The balance of external and internal borrowing is generally driven by market conditions. This is a prudent and cost effective approach in the current economic climate but will require ongoing monitoring in the event that upside risk to gilt yields prevails.

4.4.5 The pace of interest rate rises is now forecast to be slower than reported in the 2018/19 Treasury Management Strategy

#### 4.5 Council's borrowing and debt strategy

4.5.1 Owing to the way that the council's debt is structured persistently low interest rates will mean debt costs will remain higher for longer than planned in the medium term budget.

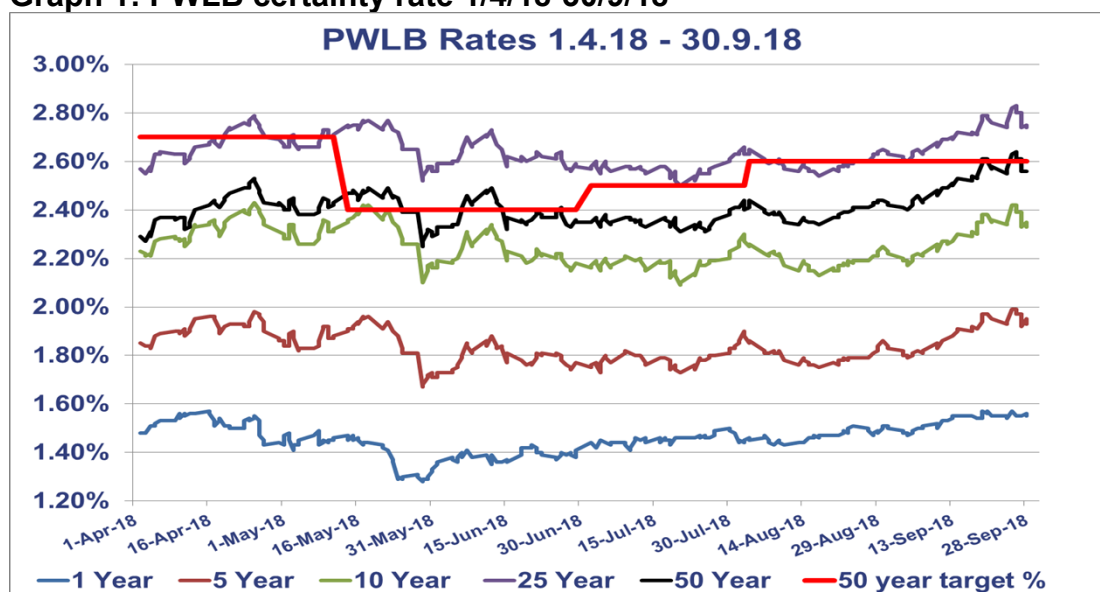
4.5.2 Table 5 shows the capital financing requirement (CFR) from prudential borrowing (based on the current capital programme) over the medium term of £850m

Table 5: CFR Growth Forecast

Year	£m
2018/19	98
2019/20	219
2020/21	215
2021/22	318
<b>TOTAL</b>	<b>850</b>

- 4.5.3 The capital programme is expected to generate additional borrowing pressures but these will be managed within the budget strategy.
- 4.5.4 Debt rescheduling opportunities have been very limited in the current economic climate given the consequent structure of interest rates, and following the increase in the margin added to gilt yields which has impacted PWLB new borrowing rates since October 2010. No debt rescheduling has therefore been undertaken to date in the current financial year. Treasury officers remain in dialogue with lenders to identify nascent opportunities should they emerge.
- 4.5.5 The graph 1 below details the movement in PWLB certainty rates for the first six months of the year to end of September 2018

**Graph 1: PWLB certainty rate 1/4/18-30/9/18**



#### 4.6 Council's investment strategy update

- 4.6.1 The council aims to achieve optimum yield on investments commensurate with appropriate levels of security and liquidity. Officers continue to invest in longer term, higher rate, quality counterparties, however these opportunities are rare in this protracted and insipid interest rate environment.
- 4.6.2 Cash balances have reduced in the first 6 months of 2018/19, as year end temporary borrowing was repaid. Capital spend has been subdued to date and slippage in the 2018/19 capital programme of £86m in 2018/19 has been identified.

#### 4.7 Treasury Performance Indicators

- 4.7.1 The investment activity during the first part of 2018/19 was in line with the strategy and council experienced no liquidity difficulties. Table 6 shows investment performance at 30 September 2016 against 7 day LIBID (London Interbank Bid Rate)

**Table 6: Treasury Performance to 30/9/18**

	2017/18			2018/19 to 30 September 2018		
	Return	Benchmark	(Under)/over	Return	Benchmark	(Under)/over
	%	%	Performance	%	%	Performance
<b>Investments</b>	1.3	0.2	1.10	1.22	0.45	0.77

#### 4.8 Prudential Indicators

There were no breaches of these indicators, half year estimates are detailed in **Appendix 1**

### 5 Policy Implications & Corporate Priorities

#### 5.1 Regulatory Changes

5.1.1 In December 2017, the Chartered Institute of Public Finance and Accountancy, (CIPFA), issued revised Prudential and Treasury Management Codes. As from 2019/20, all local authorities will be required to prepare a Capital Strategy which is intended to provide the following: -

- a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
- an overview of how the associated risk is managed
- the implications for future financial sustainability

5.1.2 A report setting out our Capital Strategy will be taken to the full council, before 31st March 2019.

#### 5.2 UK banks – ring fencing

5.2.1 The largest UK banks, (those with more than £25bn of retail / Small and Medium-sized Enterprise (SME) deposits), are required, by UK law, to separate core retail banking services from their investment and international banking activities by 1st January 2019. This is known as “ring-fencing”. Whilst smaller banks with less than £25bn in deposits are exempt, they can choose to opt up. Several banks are very close to the threshold already and so may come into scope in the future regardless.

5.2.2 Ring-fencing is a regulatory initiative created in response to the global financial crisis. It mandates the separation of retail and SME deposits from investment banking, in order to improve the resilience and resolvability of banks by changing their structure. In general, simpler, activities offered from within a ring-fenced bank, (RFB), will be focused on lower risk, day-to-day core transactions, whilst more complex and “riskier” activities are required to

be housed in a separate entity, a non-ring-fenced bank, (NRFB). This is intended to ensure that an entity's core activities are not adversely affected by the acts or omissions of other members of its group.

- 5.2.3 While the structure of the banks included within this process may have changed, the fundamentals of credit assessment have not.

### **5.3 IFRS9 accounting standard**

- 5.3.1 This accounting standard came into effect from 1<sup>st</sup> April 2018. It means that the category of investments valued under the available for sale category will be removed and any potential fluctuations in market valuations may impact onto the Surplus or Deficit on the Provision of Services, rather than being held on the balance sheet. This change is unlikely to materially affect the commonly used types of treasury management investments but more specialist types of investments, (e.g. pooled funds, third party loans, commercial investments), are likely to be impacted. Based on the current investment portfolio the impact on this authority is not likely to be significant.

- 5.3.2 The Ministry of Housing, Communities and Local Government (MHCLG), are currently conducting a consultation for an override to the requirements of the standard. There is also a proposal to time limit the override if it was granted to allow English local authorities time to adjust their portfolio of investments. Members will be updated when the result of this consultation is known.

## **6 Alternatives considered**

- 6.1 N/A

## **7 Consultation**

- 7.1 **Name of Lead Member consulted: Position: Date:**

- 7.2 This report was noted by Audit Board 7/11/18

## **8 Implications**

- 8.1 The corporate finance budget is forecast to return a budget surplus of £5m, net of a £6.4m transfer to reserves.

### **8.2 Legal Implications**

- 8.2.1 The Treasury Management Annual Report is a requirement of the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities. Local Authorities are required by regulation to have regard to both codes when carrying out their duties in England and Wales under Part 1 of the Local Government Act 2003. Paragraph 1 of this report confirms that this

report has been produced in accordance with both codes

### **8.3 Equalities Implications**

- 8.3.1 The report has no specific impact on Equalities/Diversity other than the achievement of financial savings that will help to maximise resources available for Council services

### **8.4 Other Implications relevant to this report:**

- 8.4.1 None

## **9 Background Information used in the preparation of this report**

### **9.1 Statutory requirement to list**

CIPFA – Treasury management in the public services – code of practice & guide for chief financial officers

CIPFA Prudential code for local authority capital finance

Sector treasury services Ltd. UK economic forecasts

London Borough of Newham – Treasury management strategy 2017/18 and MRP Policy statement

Treasury management practices

Local Government Act 2003

CLG Guidance on local authority investments 2010

CLG MRP Guidance

CIPFA – Treasury and investment management in UK local authorities – Guidance notes for practitioners on financial instruments (chapter 4 of the 2007 SORP)

CIPFA Treasury management In local authorities – Icelandic banks collapse

Communities and Local Government Select Committee on local government investments, 11 June 2009

Audit Commission, risk and return, English local authorities and the Icelandic banks, March 2009; and

Fathom economic forecasts.

CIPFA Risk toolkit on Treasury management

Medium Term Financial Statement

## Treasury indicators within the Prudential Code and TM Code

### Capital Prudential Indicators

The council's capital expenditure plans are the key driver of treasury management activity. The outputs of the capital expenditure plan are reflected in prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans

### Capital Expenditure

This prudential indicator is a summary of the council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle.

**Table 1: Capital expenditure indicator**

<b>Capital Expenditure £000</b>	<b>2018/19 Estimate</b>	<b>Sept 2018/19 Estimate</b>
Non-HRA	37,137	149,475
HRA	87,931	12,997
<b>Total</b>	<b>125,068</b>	<b>162,472</b>
Financed by:-		
Capital receipts	5	15,909
Capital Grants	46,284	34,979
HRA Self Financing/MRA	37,137	12,997
Revenue reserves		700
<b>Net financing need for the year</b>	<b>41,642</b>	<b>97,887</b>

### The council's borrowing need (the Capital Financing Requirement)

The second prudential indicator is the councils' capital financing requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the council's underlying borrowing need. Any capital expenditure above, which has not immediately been paid for, will increase the CFR. Following accounting changes the CFR includes any other long term liabilities (e.g PFI schemes, finance leases) brought onto the balance sheet. Whilst this increases the CFR, and therefore the council's borrowing requirement, these types of scheme include a borrowing facility and the council is not required to separately borrow for these schemes. The council currently had £122m of such schemes within the CFR.

The council is asked to approve the CFR projections below

**Table 2: Capital Financing Requirement Indicator**

<b>£000</b>	<b>2018/19 Estimate</b>	<b>Sept 2018/19 Estimate</b>
CFR - non housing - 31 March	809,364	959,591
CFR - housing 31 March	245,038	199,754
<b>TOTAL CFR - 31 March</b>	<b>1,054,402</b>	<b>1,159,345</b>
Movement in CFR	41,642	84,687
Net financing need for the year (above)	41,642	97,887
Less: MRP/VRP and other financing movements	- 16,988	- 13,200
Movement in CFR	<b>24,654</b>	<b>84,687</b>

The council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision – MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision – VRP). The charge will be funded from a repayment holiday created by retrospective adjustment following the MRP policy change last year. The above table excludes Private Finance Initiative and Finance lease transactions.

### The Use of the Council's Resources and the Investment Position

The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales etc.). Detailed below are estimates of the year end balances for each resource and anticipated day to day cash flow balances.

**Table 3: Use of Council's Resources and the Investment Position**

£000	Sept 2018/19	
	2018/19 Estimate	Estimate
Fund balances/Reserves	363,000	345,000
Capital receipts reserve	71,000	38,500
Provisions	10,000	12,300
<b>Total core funds</b>	<b>444,000</b>	<b>395,800</b>
<b>Working capital*</b>	118,000	123,700
<b>(Under)over borrowing</b>	(160,000)	(225,000)
<b>Additional debt</b>		
<b>Expected investments</b>	<b>402,000</b>	<b>294,500</b>

\*Working capital balances shown are estimated year end; these may be higher mid year.

All figures cumulative

### Affordability Prudential Indicators

The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the council's overall finances.



### Estimates of the ratio of financing costs to net revenue stream.

This indicator identifies the trend on the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream. HRA financing costs have increased where rental income has fallen due to property sales under the Right to Buy scheme but debt costs have remained static.

**Table 4: Estimates of the ratio of financing costs to net revenue stream**

%	2018/19 Estimate	Sept 18 'Estimate
Non-HRA	17.66	17.66
HRA	20.7	20.7

Estimates of the incremental impact of capital investment decisions on council tax. This indicator identifies the revenue costs associated with proposed changes to the three year capital programme recommended in this budget report compared to the council's existing approved commitments and current plans. The assumptions are based on the budget, but will invariably include some estimates, such as the level of Government support, which are not published over a three year period and the expected level of capital receipts.

**Table 5: Incremental Impact of Capital Investment Decisions on the Band D Council Tax**

	2018/19 Estimate	Sept 2018/19 Estimate
Council tax - band D	Nil	Nil

The expectation is that the budget will be based on approved capital schemes' existing commitments and current plans but if on review this is not the case this will be reported to Members. If it was decided to increase the Capital Programme by £1m above planned levels the net impact on Band D Council Tax would be £1.17 higher.

### **Estimates of the incremental impact of capital investment decisions on housing rent levels.**

Similar to the council tax collection, this indicator identifies the trend in the cost of proposed changes in the housing capital programme recommended in the budget report compared to the council's existing commitments and current plans, expressed as a discrete impact on weekly rent levels.

**Table 6: Incremental Impact of Capital Investment Decisions on Housing Rent Levels**

£	2018/19 Estimate
Weekly housing rent levels	Nil

This indicator shows the revenue on any newly proposed changes, although any discrete impact will be constrained by rent controls. The expectation is that budget will be based on approved capital schemes' existing commitments and current plans but if on review this is not the case this will be reported to Members.

### **Limits to Borrowing Activity**

#### **The operational boundary.**

This is the limit beyond which external borrowing is not normally expected to exceed.

**Table 7: Operational Boundary Limit**

£	2018/19 Limit	2019/20 Limit
Borrowing	1,600	1,600
Other long term liabilities	125	125
<b>Total</b>	<b>1,725</b>	<b>1,725</b>

#### **The authorised limit for external borrowing.**

A further key prudential indicator represents a control on the maximum level of borrowing. This represents a limit beyond which external borrowing is prohibited, and this limit needs to be set or revised by the full council. It reflects the level of external borrowing which, whilst not desired, could be afforded in the short term, but is not sustainable in the longer term. The limits have been set wide in the event that the council undertakes debt restructuring and there is overlapping of old debt with replacement debt and to ensure sufficient headroom for large Mayoral priority capital spend such as affordable housing.

**Table 8 The Authorised Limit for External Borrowing**

£m	2018/19 Limit	2019/20 Limit
Borrowing	1,700	1,700
Other long term liabilities	127	127
<b>Total</b>	<b>1,827</b>	<b>1,827</b>

The authorised limit allows for any potential overdraft position as this will be counted against the overall borrowing, and provides headroom for rescheduling (i.e. borrowing in advance of repayment)

Separately, the council is currently limited to a maximum HRA CFR through the HRA self-financing regime although it is recognised that this is under review. This limit is currently:

**Table 9: The HRA Debt Limit**

£m	2018/19 Limit	2019/20 Limit
Total	249	249

### Prudence

The council's treasury portfolio position at 30 September 2018, with forward projections are summarised below. The table shows the actual external debt against the CFR.

**Table 10: Current Portfolio Position****Commas again**

	<b>Sept 2018/19</b>	
<b>£m</b>	<b>2018/19 Estimate</b>	<b>Estimate</b>
<b>External Debt</b>		
Debt*	772	812
Other long term liabilities OLTL	122	122
<b>Actual Gross Debt 31 March</b>	<b>894</b>	<b>934</b>
The CFR **	1054	1159
<b>(Under)/over borrowing</b>	<b>-160</b>	<b>-225</b>

\*\* CFR (includes PFI and Finance leases)

The prudential indicator requires that the council needs to ensure that its gross debt does not, except in the short term, exceed the total of its CFR, in the preceding year plus estimates of any additional CFR for 2018/19 and the following two financial years. This allows that borrowing is not undertaken for revenue purposes.

### **Treasury Management Limits on Activity**

There are three debt related treasury activity limits. The purpose of these are to restrain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set to be too restrictive they will impair opportunities to reduce costs/improve performance.

**The Code** requires that for LOBO loans the maturity date is now deemed to be the next call date.

The indicators are:

- Upper limits on variable interest rate exposure. This identifies a maximum limit for variable interest rates based upon the debt position net of investments.
- Upper limits on fixed interest rate exposure. This is similar to the previous indicator and covers a maximum limit on fixed interest rates
- Maturity structure of borrowing. These gross limits are set to reduce the council's exposure of large fixed rate sums falling due for refinancing; these have been kept deliberately wide to provide flexibility for any restructuring that might be carried out to de-risk the debt portfolio.

**Table 11: Interest Rate Principal Exposures and Maturity Structure Limits 2018/19**

£m	2018/19	Sept 2018/19 Actual
<b>Interest Rate Principal Exposures</b>		
Limits on fixed interest rate based on net debt *	1200	210
Limits on variable interest rates based on net debt	700	110
Limits on fixed interest rates:		
~ Debt only	1600	662
~ Investments only	700	452
Limits on variable interest rates		
~ Debt only	1000	150
~ Investments only	500	40

Maturity Structure of Fixed Rate Borrowing 2017/18		
	2018/19	2018/19
	Lower	Upper
Under 12 months	0%	90%
12 months to 2 years	0%	90%
2 years to 5 years	0%	90%
5 years to 10 years	0%	100%
10 years and above	0%	100%
Maturity Structure of Variable Interest Rate Borrowing 2016/17		
Under 12 months	0%	90%
12 months to 2 years	0%	90%
2 years to 5 years	0%	100%
5 years to 10 years	0%	100%
10 years and above	0%	100%

Investment treasury indicator and limit – total principal funds invested for greater than 364 days. These limits are set with regard to the council's liquidity requirements and to reduce the need for early sale of an investment, and are based on the availability of funds after each year-end.

**Table 12: Maximum Principal Sum Invested > 364 days**

£m	Estimate	
	2018/19	30-Sep-18 2018/19
Principal sums invested > 364 days	400	111

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## LONDON BOROUGH OF NEWHAM CABINET

<b>Report title</b>	<b>Small Business Portfolio Review</b>	
<b>Date of Meeting</b>	<b>04-Dec-18</b>	
<b>Lead Officer and contact details</b>	<b>Andrew Ireland Head of Shareholder Function and Investment Portfolio Management Tel: 020 3373 7104</b>	
<b>Exec. Director</b>	<b>Michael O'Donnell, Interim Executive Director of Financial Sustainability</b>	
<b>Lead Member</b>	<b>Cllr Terence Paul, Cabinet Member for Finance</b>	
<b>Key Decision?</b>	Yes	Result in anticipated savings of over £500k
<b>Exempt information &amp; Grounds</b>	Yes / No	Appendices 3-6 are exempt by virtue of paragraph 3 of the Access to Information Procedure Rules set out in the Constitution pursuant to Schedule 12A Local Government Act 1972, as amended: Information relating to the financial or business affairs of any particular person (including the authority holding that information). In the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.
<b>Wards Affected</b>	None	
<b>Appendix</b>	<ol style="list-style-type: none"> <li>1. Summary of small businesses</li> <li>2. Current portfolio structure</li> <li>3. Current financial forecast - Exempt</li> <li>4. Proposed portfolio structure - Exempt</li> <li>5. Proposed Efficiencies - Exempt</li> <li>6. Performance bridge - Exempt</li> </ol>	

### 1 Executive Summary

1.1 The Council created a portfolio of 12 local authority trading companies under the '*Council Services to Small Businesses (CSSB)*' programme between 2012 and 2018. Following a change in administration, this programme ceased and no new externalisations are planned with a focus now on reviewing the current portfolio of companies to:

- 1.1.1 identify and introduce portfolio-level efficiency gains (whether legal or structural), and
- 1.1.2 determine the Council's future strategy to ensure continued delivery of an optimal outcome for both residents and the Council as shareholder.

### 2 Recommendations

2.1 For the reasons set out in the report and its appendices, Cabinet is



recommended to agree:

- 2.1.1 to recalibrate the Small Business programme to increase control, reduce costs and improve overall outcomes for residents and the Council
- 2.1.2 to analyse and review the proposal to consolidate the three streets & estates businesses into one company with a remit to service the entire borough to reduce cost, and deliver better service synergies
- 2.1.3 to undertake review of service delivery options & value-for-money in relation to ECAM and Juniper. No efficiency gains / cost reductions for each of these proposals is included in this document.
- 2.1.4 to delegate to the Interim Chief Executive after consultation with the Mayor, Cabinet Member for Finance, the Interim Executive Director of Financial Sustainability and the Director of Legal and Governance:
  - a. the terms of any dividend policy which is deemed to incentivise commercialism whilst balancing the budgetary requirements of the Council, maintain service delivery and ensure residents are placed firmly at the heart of the company's operation.
  - b. the determination of optimal method of service delivery for the activities currently undertaken by ECAM.

### **3 Background**

- 3.1 The Localism Act 2011 gave the message to Local Authorities to "*be more commercial, become self-financing*" in an environment of persistent and material cuts to the Council's budget by central government. The CSSB programme was subsequently established in 2012 to test the premise that traditional Council services could be delivered more efficiently, effectively and meaningfully as external independent businesses.
- 3.2 By retaining ownership of the externalised businesses, the Council also benefited financially; by generating proportional income over simple cost recovery (which helped to relieve broader budget pressures), and strategically; by retaining significantly more control and influence over the companies than if the services provided were outsourced, in order to protect public interests.
- 3.3 The use of alternative delivery vehicles (Council owned companies, charities etc.) enables either or a combination of access to new sources of income for the Council, innovative and dynamic service management models and the potential to reduce service delivery costs.
- 3.4 The programme was designed to change Council services to provide a better, fairer deal for residents, increase local employment opportunities and to build resilience in the local community. The approach was intended to enable close

working and better understanding of current council services, gradually turning them into independent businesses where staff are given the power to be more responsive and accountable to the needs of residents and the local area, as well as making services more efficient.

- 3.5 Transferring staff were not disadvantaged having TUPE'd across, preserving their Council terms and conditions (including admitted access to the LGPS and annual pay rises in line with the Council). Whilst there is no contractual or other binding obligation, all staff employed in the undertaking of Council contracts within the small businesses are paid above London Living Wage (LLW) rather than National Living Wage/National Minimum Wage rates. The LLW is currently 14.2% & 27.1% over the National Living Wage & National Minimum Wage respectively.
- 3.6 The intention of this paper is to highlight work currently being undertaken to: examine the existing small businesses; identify inefficiencies; propose recommendations to remediate; appraise potential alternative service delivery options, and optimise the efficacy of the portfolio.
- 3.7 Previous relevant reports include: a Cabinet Decision of 23<sup>rd</sup> June 2011 to ensure that staff are paid a minimum of LLW.

#### **4 Key Considerations & Proposals**

- 4.1 It is acknowledged the current portfolio is not optimally structured with a couple of identified improvements proposed:
  - 4.1.1 Following the separation of the borough into three distinct areas (from a service deliver perspective), there are three Streets & Estates businesses in the portfolio servicing those respective wards. An amalgamation of these businesses has the potential to provide residents with consistency, deliver both operational and management cost savings whilst creating a larger entity capable of improved margins via better procurement and more efficient staff provision. Appendix 5(i) & 5(ii).
  - 4.1.2 In line with making the portfolio as efficient as possible, a review of those businesses focused on '*social*' service delivery (rather than operational, i.e. with a profit motive) should be undertaken. This would focus on whether this type of business attracts additional charges which would not be incurred if operated in-house (these costs would have to be compared with the cost of reversing the externalisation process).
- 4.2 The supplementary corporation tax liability incurred by the small businesses on post-externalisation trading is a material issue, growing in magnitude as the businesses mature and become more profitable, which requires urgent rectification. Whilst any profit derived from external trading by the small businesses will continue to be chargeable to corporation tax (unless from charitable activities) trade which is direct with the Council (Teckal-compliant)

should be non-chargeable. All profit created by the small businesses has been / is currently subject to corporation tax at 19% (with business plans constructed on this basis). Application to HMRC for dispensation for Teckal-compliant trade is anticipated to rectify this position. See Appendix 5iii

- 4.3 One of the principles of the small business programme was the anticipation of an equitable sharing of net profit between the Company and the Shareholder / Council. This was never a contractual arrangement but verbally referenced in the recruitment of key staff and during the externalisation process. However, given the financial climate in which the Council currently operates, the donation of a significant proportion of its contribution back to the company is financially unviable and does not stack up from an investment perspective.
- 4.4 Nonetheless, commercialism and entrepreneurialism are core drivers of small business success and encouraged within the portfolio. In order to support this activity and compensate for the retraction of a profit share, it is proposed to introduce a mechanic which rewards performance above expectation. For example, a proportion of a company's contribution in excess of the business plan could be made available for allocation to an equitable company bonus scheme.
- 4.5 The cost of undertaking this review & making the necessary changes to the portfolio are limited to transactional expense only; funded from the Transformation budget with no additional funding required at this stage.
- 4.6 As the companies have established themselves, the level of employment within each of the businesses has increased since leaving the Council

## 5 Policy Implications & Corporate Priorities

**Commitment / Pledge: #35** - *Review all the Council's Joint Ventures, PFI Schemes and outsourced contracts. I will end all further privatisation and outsourcing of council services on day one of my new administration*

## 6 Alternatives considered

A number of alternative proposals were reviewed:

1. **Retain the status-quo** with no alteration to the portfolio structure or delivery method. This is the cheapest option from a transformational perspective but carries a significant lost financial & operational opportunity cost.
2. **Alternative delivery options** - as part of this review process a number of alternative options to deliver services have been reviewed alongside the savings and associated business impact.
3. **Internalisation** - the fall-back position is to bring these small businesses back in-house. However, this has significant financial cost and a heavy opportunity cost relating to dynamism, organic growth &

contribution.

4. **Outsourcing** – reviewed but not thoroughly considered due to the political appetite to increase outsourcing activity.

## 6.1 Recommended Option

This paper acknowledges the benefits derived from a strategic review of the portfolio, providing more economic, efficient and effective service delivery to the benefit of residents and the shareholder.

This paper recommends:

- i) Review & recalibration of the small business portfolio to enhance control; improve proficiency and overall resident outcomes.
- ii) Undertake detailed review of identified portfolio restructuring, delivering recommended outcome and taxation opportunities to streamline operation and optimise contribution.
- iii) Undertake value-for-money analysis of service delivery and review alternative service delivery options.
- iv) Determination of the Council's dividend policy to balance budgetary pressure and business delivery / growth.

## 7 Consultation

**Name of Lead Member consulted:** Terence Paul

**Position:** Member for Finance

**Date:** 23-Oct-18

There is no requirement of public consultation on this decision.

## 8 Implications

### 8.1 Financial Implications

- 8.1.1 An outline of the current and forecast performance (revenue & profit after tax) for each of the small businesses appears in Appendix 3. The latest 2018/19 forecast is derived from the businesses submissions for August. This is used as a base for future years' forecasts. The six year total show a combined revenue position of £347m with profits after tax of £17.7m resulting in a net profit margin of 5.1%
- 8.1.2 An action to undertake a review to determine whether there is any financial and operational advantages to consolidating the three Streets & Estates businesses has been proposed. Initial forecasts are estimated to yield an initial £732k operating profit savings in 2019/20 following consolidation. This results in an improvement over the 4 years reviewed of £2.37m. Appendix 5(i) & 5(ii). Excluded are any non-cash / operational benefits which would be identified in the detailed review.

Transactional costs (professional corporate legal fees, management and re-branding) are estimated to be £105k.

- 8.1.3 As part of the mayoral focus on efficiencies, the Every Child programmes are currently being assessed to identify savings by reducing/significantly decreasing the current funding allocation to Every Child Limited.
- 8.1.4 This would possibly need to be revised if the assessments found that the effect and impact current programmes are having on children's access to musical, cultural and sporting opportunities in Newham and whether it is value for money and can it be delivered differently to ensure further savings for the Council without compromising service delivery to the residents of Newham were too onerous or detrimental.
- 8.1.5 The Mayor has commissioned a review of the Every Child a Musician (ECAM) programme with a view to delivering revenue budget savings from January 2019.
- 8.1.6 Pursue HMRC dispensation for payment of Corporation Tax liability relating to Teckal-compliant trade to increase the revenue to the Council. Transactional costs (professional taxation advice) are expected to be £43,200 for the portfolio. Savings are anticipated to be in excess of this amount - assuming delivery of prudent business plan projections, the impact is estimated to be a saving of over £3.2m over the next 4 years (Appendix 5v).
- 8.1.7 The effects on the BAU forecasts (8.1.1 above & appendix 3) of incorporating the above projects are shown in Appendix 6. There are efficiency gains made from the proposed consolidation of the Streets & Estates businesses and the corporation tax rebates of approximately £4.95m over the 4 years forecast.
- 8.1.8 The cost of undertaking this review and making the proposed changes to the portfolio are limited to transactional expense only; funded from the Transformation budget with no additional funding required at this stage. Changes to the programme will need to reflect the potential impact on the Pension Fund and corporate overheads.

## **8.2 Legal Implications**

- 8.2.1 All of the Council's small businesses were incorporated as companies with the Council as Shareholder or Member. Detailed Shareholding or Membership information is detailed within Appendix 1 of this report. The Council has general power of competence under Section 1 of the Localism Act 2011, which gives the power to do anything an individual can do, subject to any statutory constraints on the Council's powers.
- 8.2.2 Where the Council is the sole shareholder, this status gives the Council powers under the Companies Act 2006. The Council also has reserved powers under the Articles within each company to make changes.

Ultimately, the Council may wind up the companies and deliver the services in a different way, i.e. internally or via an external company.

- 8.2.3 In making any decision, the Council must act rationally. It must make its decision on sufficient information and evidence (as set out in the report) and take into account the relevant considerations. Of particular relevance here is the Council's duty to ensure best value is provided in service delivery and its fiduciary duty to local taxpayers. The proposals set out are in large part designed to create additional efficiency in structure and tax arrangements.
- 8.2.4 The report proposes a number of reviews and proposals that will return to Cabinet for final decision including any shareholder resolutions which may be required. Where necessary, those decisions may require consultation and / or compliance with the Council's equality duties in respect of changes to service provision. A change of employer of employees within the CSSB portfolio will also likely to be a relevant transfer for the purposes of the TUPE Regulations 2006 and this will need to be taken into account including duties on the employer companies to make appropriate consultation arrangements.

**Reason for Urgency.**

To start the review process and rationalisation to enable earlier realisation of the anticipated savings.

## APPENDIX 1:

### Current Small Business Portfolio

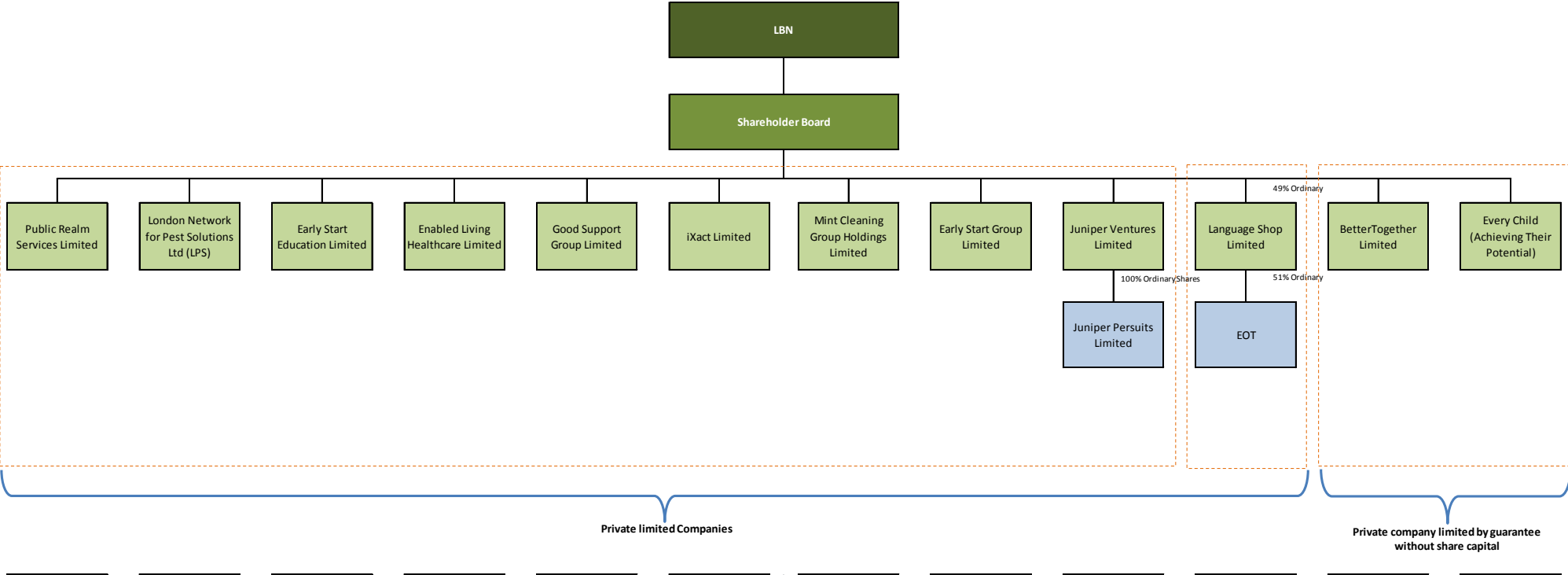
Live	Company Name	Registered Address	Type of Entity	Business Summary	Ownership Structure	Contact	Externalisation Date	Ext FTE	Current FTE
	The Language Shop Limited	Newham Dockside, 1000 Dockside Road, London, E16 2QU Company number 08882661	Private limited Company	LATC which commenced trading in Oct-15. The company provides translation and interpreting services to customers across the public sector, primarily in North and East London but also across the UK. Two phase transfer with 51% of the LATC shares transferred into a Employee Owned Trust.	CLS 51% EOT / 49% LBN	Jaimin Patel Jaimin.Patel@newham.gov.uk 0203 373 7183 / 07803 853 330	Apr-16	14	20
	BetterTogether Limited	Stratford Advice Arcade, 107-109 The Grove, Stratford, London, E15 1HP Company number 09963252	Private company limited by guarantee without share capital	A company limited by guarantee (CLG), gaining CQC registration Jun-16. The company runs Newham's Shared Lives Scheme - a model of support which involves host families from the community offering a room in their house, plus support, to individuals who are eligible for Adult Social Care funding, as an alternative to supported living or residential care. The scheme recruits and trains families, matches them and supports the arrangements, ensuring quality throughout.	CLG Membership organisation (Council, staff, carers, customers)	Sarah Havard sarah@bettertogether.org.uk 0208 519 9536 / 07814 115 965	Jun-16	4	5
	Public Realm Services Limited	Administration Reception Central Depot, Folkestone Road, East Ham, London, United Kingdom, E6 6BX Company number 10302091	Private limited Company	LATC started trading in Dec-16. The company provides street cleansing and estates management services in the southern part of the borough (seven wards: Plaistow North; Plaistow South; Canning Town North; Canning Town South; Custom House; Beckton and the Royal Docks) and delivery of gully cleansing and removal of large fly tips to the whole borough.	CLS LBN 100% Shareholder	John Wild John.Wild@publicrealmsservices.co.uk 020 3373 1489 / 07947 837 439	Dec-16	80	107
	London Network for Pest Solutions Limited	86-90 Paul Street, London, England, EC2A 4NE Company number 10419924	Private limited Company	LATC commenced trading in Feb-17. The company promotes its ability to control all pests, particularly those of public health significance, to ensure better and safer living conditions for all customers and to protect the environment by using both the best technology available and the safest method of control.	CLS LBN 100% Shareholder	Paul Cooper paul.cooper@lnpestsolutions.com 0203 373 2997 / 07956 449 342	Feb-17	9	13
	Early Start Education Limited	2-24 Shrewsbury Road, London, United Kingdom, E7 8AL Company number 10351143	Private limited Company	LATC commenced trading Mar-17. The company provides child care services.	CLS LBN 100% Shareholder	Justin Elder Justin.elder@earlystartgroup.com 0203 373 0283	Mar-17	1.5	18
	Enabled Living Healthcare Limited	7 Alpine Way, Beckton, London, United Kingdom, E6 6LA Company number 10420273	Private limited Company	LATC started trading Apr-17. The company delivers services which fulfil the Council's statutory requirement for provision of community equipment (ICES) plus the assessment and enablement planning for people with sensory impairment (IEDA). The equipment provided facilitates people to complete tasks which would otherwise be impossible, helping residents to regain or maintain their mobility & independence in the community and potentially swifter hospital discharge.	CLS LBN 100% Shareholder	Mathew Sheehan mathew.sheehan@enabledlivinghealthcare.co.uk 0203 373 7270 / 07791 259 374	Apr-17	24	35

Live	Company Name	Registered Address	Type of Entity	Business Summary	Ownership Structure	Contact	Externalisation Date	Ext FTE	Current FTE
	<b>The Good Support Group Limited</b>	The Community Resource Centre, 200 Chargeable Lane, London, United Kingdom, E13 8DW  Company number 10424036	Private limited Company	LATC commenced trading in May-17. The company provides bespoke, safe, high quality non-residential support to adults with learning disabilities, older people, including those living with dementia; respite services, facilitated access to education and transition services for children and young people between ages 8-25; and develop further non- residential services.	CLS  LBN 100% Shareholder	Keith Tancock keith.tancock@thegoodsupportgroup.com 0203 373 4876 / 07808 220 965	May-17	63	93
	<b>iXact Limited</b>	Central Depot Folkestone Road, East Ham, London, United Kingdom, E6 6BX  Company number 10713056	Private limited Company	LATC commenced trading in Jul-17. The company provides street cleansing and estates management in the west of the borough (six wards: Stratford and New Town, West Ham, Forest Gate North, Forest Gate South, Green Street West and Green Street East).	CLS  LBN 100% Shareholder	Graeme Waugh Graeme.Waugh@ixactlimited.com 020 3884 9161 / 07712 575 796	Jul-17	69	77
	<b>Mint Cleaning Group Holdings Limited</b>	Central Depot Folkestone Road, East Ham, London, United Kingdom, E6 6BX  Company number 10809301	Private limited Company	LATC started trading in Aug-17. The company provides street cleansing and estates management in the east of the borough (seven wards: Manor Park, Little Ilford, East Ham North, East Ham Central, East Ham South, Wall End and Boleyn)	CLS  LBN 100% Shareholder	Brian Veale Brian.Veale@MintCleaningGroup.co.uk 020 3373 4675 / 0797 673 4619	Aug-17	93	116
	<b>Every Child (Achieving Their Potential)</b>	Grassroots, Memorial Avenue, London, E15 3DB  Company number 11126513	Private company limited by guarantee without share capital	A company limited by guarantee (CLG), started operating in Apr-18. The entity delivers key areas of Newham's Every Child Programme (e.g. Musician, Theatre Goer, Chess Player, Sports Person) which complements traditional learning in schools, and gives young people access to wider opportunities that offer a mix of academic and social education which they may otherwise not experience.	CLG  Membership organisation (Council, staff, carers, customers)	Norma Spark norma.spark@everychild.com 0203 373 7955	Apr-18	11	10
	<b>Early Start Group Limited</b>	2-24 Shrewsbury Road, London, United Kingdom, E7 8AL  Company number 11019818	Private limited Company	LATC commenced trading Jan-18. The company provides a peripatetic 'Best Start in Life' offer to children aged 0-5 and their families (child development, parenting intervention, health interventions) and family contact services.	CLS  51% EOT / 49% LBN	Justin Elder Justin.elder@earlystartgroup.com 0203 373 0283	Jan-18	54	53
	<b>Juniper Ventures Limited</b>	The Old Town Hall, 29 Broadway, London, England, E15 4BQ  Company number 10641710	Private limited Company	LATC commenced trading Apr-18. The company provides catering and cleaning services to most schools in the borough. A wholly owned subsidiary (Juniper Pursuits Limited) is the non-Teckal vehicle providing services to the borough's Academies	CLS  LBN 100% Shareholder	Michael Hales michael.hales@juniperventures.co.uk 0203 373 4380 / 07545 477 141	Apr-18	850	1034



Current portfolio structure

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## LONDON BOROUGH OF NEWHAM

### Cabinet

<b>Report title</b>	Civil Traffic Enforcement and Associated Services (Parking Contract)	
<b>Date of Meeting</b>	<b>4th December 2018</b>	
<b>Lead Officers and contact details</b>	David Cloake, Strategic Enforcement Manager (Operational Support) 0203 373 7576, M: 07412 541752 Darien Neville, Parking Enforcement Commissioner 0203 373 9472, M: 07870 518233	
<b>Director, Job title</b>	Matthew Hooper, Director for Enforcement and Safety	
<b>Lead Member</b>	Councillor Rachel Tripp, Cabinet Member for Environment and Highways	
<b>Key Decision?</b>	Yes	Reasons: 1. Procurement exercise over £500k; 2. Affects all Wards;
<b>Exempt information &amp; Grounds</b>	Yes	Appendix 1 is exempt by virtue of paragraph 3 of the Access to Information Procedure Rules set out in the Constitution pursuant to Schedule 12A Local Government Act 1972, as amended: Information relating to the financial or business affairs of any particular person (including the authority holding that information). In the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.
<b>Wards Affected</b>	All	
<b>Appendices (if any)</b>	Appendix 1: Options Appraisal (please note the classification of this document for commercial reasons).	

### 1 Executive Summary

- 1.1 This report seeks the authority to bring “in house” specific elements of the current Parking Enforcement contract and to commence the procurement for Civil Traffic enforcement and associated services which expires on the 31<sup>st</sup> July 2019.
- 1.2 Parking enforcement, though often unpopular, plays a vital role in supporting the free and safe movement of pedestrians, cyclists, drivers and all road users. This involves enforcing a range of parking contraventions from unauthorised parking in resident’s bays to parking on double yellow lines. In pursuit of this aim, around 220,000 Penalty Charge Notices (PCNs) are issued per year

(17/18 figures), amounting to fines totalling around £12.5m per year.

- 1.3 The Mayor has committed to review all of the Council's outsourced services and transform Newham into a beacon of Community Wealth Building. This report explores options that seek to meet these objectives. This report recommends that a number of key functions, including the CCTV Control (identification of parking interventions); management of the vehicle pound and management of the Stratford Multi Storey Car Park are brought in-house. Due to the prevailing risks described below it is not considered practical to bring all services in-house during this current process. (Refer Appendix 1).
- 1.4 The report recommends that procurement of other Parking Enforcement Services requires that the contractor commits to pay all frontline operatives and administration staff dedicated to the contract the London Living Wage (currently £10.55 a significant increase to the current rate paid to operatives)
- 1.5 The report also highlights a number of important risks and issues associated with each option, highlighting mitigation measures to assist in their management. If the preferred option is not agreed then increases in costs will occur as a result of transferring the service to an in-house operation. This will impact highways improvements budgetary provision.

## **2 Recommendations**

### **2.1 Cabinet is asked to agree:**

- That Cabinet note that this report initiates a transition period during which we will aim to end outsourcing of all parking enforcement activities. This period will coincide with the initial 3 year contract period break point (see below).
- That the following current Parking Enforcement elements of the contract be moved into the Council's Enforcement & Safety directorate for in house delivery from 1<sup>st</sup> August 2019;
  - CCTV Control (identification of parking interventions);
  - Management of the vehicle pound and;
  - Management of the Stratford Multi Storey Car Park
- to commence the procurement of Parking Enforcement Services via OJEU competitive tender for a 3 year contract commencing 01<sup>st</sup> August 2019 (with a possibility of an extension of 1 plus 1 years) covering On & Off Street parking enforcement & removal of vehicles; and the supply of associated hardware and software services.
- that the technical specification includes the requirement for the successful contractor to meet London Living Wage standards and the need to demonstrate high quality human resource procedures and policies, including the recognition of TUC affiliated Unions as an integral part of its operation;
- that during the initial contract period, and as part of the Council's policy in developing community wealth opportunities, the Council include the Parking Enforcement service as a potential area for inclusion and

development in time for consideration in 2022

### **3 Background**

- 3.1 Parking enforcement seeks to support the delivery of an integrated highways management capability within the borough and seeks to support the Mayor's approach to fair parking.
- 3.2 The primary objective of compliance is achieved through foot patrols and the presence of cameras together with the issue of a Penalty Charge Notice (PCN) to drivers contravening parking and traffic controls.
- 3.3 The current contract arrangements expire on the 31<sup>st</sup> July 2019. If the service is not maintained, the Council will not be able to maintain and deliver a fair parking policy for the borough, its residents, businesses and road users.
- 3.4 The current Parking Enforcement contract attracts a cost of approximately £4.4m per annum. Income attributed to the contract is circa £12.5m per annum (total for both PCN and permit issuing) or a potential of £62m over the life of this contract. All surpluses generated can only be applied to specific purposes including further parking provision, highway improvement and maintenance and public transport support.
- 3.5 The service also provides a range of employment opportunities for local people, thus supporting the Mayor's policy community wealth building policy providing local opportunities for local people, however, it is recognised that at present, frontline operative wage levels are not at London Living Wage levels.
- 3.6 Whilst the longer term income from the contract will adequately cover the running costs of the contract, three short term financial risks are highlighted accordingly for information:
  - Whilst reasonable estimates have been made against predicted contract value, the exact value of the contract is unknown at this time. This may attract a need to consider a growth bid to address this potential shortfall;
  - As a result, there may be a potential shortfall of current budget allocation within the 2019/20 provision to fully cover contract costs. This may cause a short term pressure to the MTFS that would require additional funding to be identified.
  - Whilst TUPE costs are recognised within the financial analysis, these are an estimate. Exact numbers of personnel requiring transfer can only be confirmed upon analysis of each tender return and their associated proposals and opportunities related to Lot 2 (see below).

### **4 Considerations & Proposals**

- 4.1 A comprehensive options appraisal was undertaken in July 2018 in relation to this contract to support the retendering process (see Appendix 1). This was further refined in November 2018 to assess the possible delivery of this service in-house or as part of a community wealth building opportunity.

- 4.2 The London Borough of Camden conducted a recent internal survey looking at the operation of on-street enforcement. . Of the responses received, only the London Borough of Tower Hamlets operates its on-street enforcement in-house, with vehicle removals being handled by a contractor.
- 4.3 According to the London Borough of Camden's research, while several boroughs who outsource their parking enforcement have investigated the option of bringing the service in-house, no authority has returned to an in-house enforcement model from an external contractor.
- 4.4 Newham's own research has concluded that at this time, only 7 London local authorities currently operate an in-house delivery model for parking enforcement.
- 4.5 Each option will carry a range of risks associated with cost, income generation, operation and delivery. Additional risks will present themselves should the service delivery model of the on-street capability change immediately from contracted to in-house status, as timescales are extremely tight to meet the 1<sup>st</sup> August deadline.
- 4.6 A phased approach that embraces a shorter contract period with break clauses would enable the Council to develop a robust method of change management and policy development that would address the following risks associated with an immediate change;
- Costs increases that would place significant pressure on existing revenue challenges;
  - The risks of potential disruption in critical revenue and enforcement activities;
  - The assessment of policy and impact of the Council both dictating parking policy and enforcing it as a single authority;
  - The need to implement a significant back-office change programme involving a range of functions will require significant management a resourcing, as over 100 personnel would be required to be TUPE'd across to the Council.
- 4.7 It is recognised that wage levels paid by the current contractor are below the London Living Wage. In line with Mayoral policy, the new specification will require that a contractor pays all frontline service delivery personnel at London Living Wage levels.
- 4.8 Any baseline increase would represent an 11% increase in hourly rate which may be loaded into tender pricing accordingly. The in-house delivery option would attract an increase in employer pension superannuation contributions.
- 4.9 It is also desirable that any future contractor has sound human resource policies and procedures to validate their approach as a fair and considerate employer. This should include the requirement to recognise the value of Unions and their important role as a partner.
- 4.10 In preparation for a possible tendering process, market engagement events

were held with providers on the public sector owned professional buying organisation (ESPO's) parking management solutions framework. The intention was to engage with "parking enforcement software" providers to assess the development of a specification of system design and maintenance that would be best suited to the delivery and on-going support of the parking enforcement contract. It is believed that by building these new requirements into the specification for Lot 2, we will further support and improve all enforcement provisions provided by the Lot 1 contractor.

- 4.11 Additionally, an assessment has been carried out to consider whether the service could be delivered more efficiently and effectively utilising an in-house model or through a community delivered initiative.
- 4.12 After making an assessment of cost, technical and capability requirements, logistical requirements, timescales and risk (see Appendix 1 – Options Appraisal), it is recommended that the following approach be applied accordingly:
- That the transfer of certain functions to an in-house status be progressed to better harmonise the London Borough of Newham's current operations based at the Folkestone Road Depot, as well as deliver an improved in-house solution: These functions are as follows and should be deployed within this revised model from 1<sup>st</sup> August 2019:
    - CCTV Control (identification of parking interventions);
    - Image review, capture and input;
    - Management of the vehicle pound and;
    - Management of the Stratford Multi Storey Car Park.
  - That a procurement process for both Lot 1 and Lot 2 of the Parking Enforcement Services be tendered via OJEU competitive tender;
  - In order to support a community wealth building policy, whilst not undermining investor interests, a contract placement structure of a 5 year contract period, with break clauses at the end of year 3 and 4 be utilised;

As a result, relevant TUPE arrangements will need to be progressed once roles and numbers are confirmed (see below).

- 4.13 In relation to this, the procurement process provides an efficiency and service development opportunity for the Council, as it will enable Lot 2 tenderers to demonstrate innovation in this area to reduce costs. It will enable the Council to make an informed assessment of a range of technological solutions and enhancements, identify savings, and inform us on the exact requirements for the in-house transfer proposals. These will be tabled in our contract appointment recommendations and proposal report to cabinet accordingly.

However, for budgeting purposes, it is anticipated that bringing in-house these specific elements of the current contract will mean a work force of circa 20. HR is fully aware of the service's intention and HR will be working closely with the commissioning team to ensure smooth transition.

- 4.14 In relation to the tender assessment process, work is ongoing to finalise and

agree formal criteria with Procurement. However, Cabinet should be assured that the following will be included:

- Pricing structure and cost will account for 70% of the scoring;
- The remaining 30% will account for a range of quantitative and qualitative factors related to service delivery provision, which will seek to include flexible deployment capability, performance management, deployment of operations, service availability and the ability to meet specific borough needs.

4.15 It should also be stated that there is value in our governance to appoint a dispassionate, independent capability to conduct these enforcement activities by a disinterested independent party with no specific targets or influences related to the enforcement process.

## **5 Policy Implications**

5.1 The Mayor has committed to review all of the Council's outsourced services. This report forms part of this ongoing process.

5.2 The report will bring a number of functions relating to the current Civil Traffic Enforcement and Associated Services Contract in-house. However, it recommends that outsourcing continues to be the best option for Lot 1 and Lot 2.

5.3 This report seeks to ensure that all contracted staff are paid the London Living Wage and that the workforce are protected with strong terms and conditions. The contract will require the service provider to pursue local recruitment through advertising, use of existing and future worklessness initiatives, and the provision of NVQ training for all field staff.

5.4 Further development in relation to community wealth building will be applied to future delivery models. This is why the new contract is being offered for a term of 3+1+1 years rather than the ten year term of the current contract.

## **6 Alternatives considered**

6.1 See Appendix 1 - Options Appraisal.

## **7 Consultation**

### **7.1 Name of Lead Member consulted:**

Councillor Rachel Tripp, Cabinet Member for Environment and Highways and the Mayor have been consulted informally over the period of tender development. Policy changes regarding outsourcing options and approaches have been accounted for (see section 5).

## **8 Implications**

### **8.1 Financial Implications**

The current Parking Enforcement contract is due to expire on 31st July 2019 therefore this paper seeks approval to commence procurement of the new contract, in line with the recommendation section 2.1.

The current contract has been subject to inflationary increases which have previously been met within existing budgets although the increased costs for additional requirements around the full deployment of the controlled parking zones (CPZ's) has resulted in generating additional PCN income.

The total estimated annual budget for the contract comprises the following elements:

<b>Expenditure Type</b>	<b>£0</b>
On and off street enforcement	3,358
Operating Stratford MSCP	445
Management of Car Pound	266
Removal of vehicles	240
IT element	200
Total Budget	4,509
Less: In-house Provision	(1,000)
<b>Total Funding Available</b>	<b>3,509</b>

The above includes additional funding of £220k to reflect the inflationary factor and expansion of parking zones along with £110k relating to increased cost of the In-House provision.

It is envisaged that the new contract attributable to the outsourced service will be in line with the existing funding available on a like for like basis.

The specific services being brought in house are within the current contract (Lot 1). This is in the region of £1m including London living wage, pension and overhead costs. This will be used to fund the estimated cost of 20 FTE posts.

During the tender process, all avenues will be explored to achieve value for money and identify efficiencies where possible. There is a financial risk that the tender evaluations may return significantly higher than the available funding however it is not possible to quantify this until the tenders have been received.

In addition there are TUPE implications that need to be considered and evaluated to ensure the Council are able to deliver the services within the funding available. The tender process will allow a more informed assessment of the exact requirement for the in-house transfer proposals.

## 8.2 Legal Implications

- In line with the Council's Constitution this report seeks approval to procure Parking Enforcement Services and associated hardware and software technology and to bring in specified services detailed in section 2.2 of this report for future in house delivery. The decision to award of the contract will be made by Cabinet after the procurement activity undertaken in line with this report.
- The procurement activities will be arranged through compliant OJEU



tender as prescribed by Public Contracts Regulations 2015 thus ensuring best value obligations on the Council under Local Government Act 1999 are met. The Council is capable of contracting for delivery of its services by exercising its general power of competence under Section 1 of the Localism Act 2011, which gives the power to do anything an individual can do, subject to any statutory constraints on the Council's powers.

- The Road Traffic Regulation Act 1984 (RTRA 1984), places a duty on the Council to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), and to provide suitable and adequate parking facilities on and off the highway. Parking controls and enforcement are covered under various legislation and guidance including Greater London (Powers) Act 1974, Road Traffic Regulation Act 1984, London Local Authorities Acts 1996 and 2003.
- The Council is required to ensure that its CCTV enforcement equipment is compliant with the Civil Enforcement of Parking Contraventions (Approved Devices) (England) Order 2007 under the Traffic Management Act 2004. In collecting and processing data the Council must also ensure that its activities are compliant with General Data Protection Regulation 2016, the Regulation of Investigatory Powers Act 2000 and the Freedom of Information Act 2000.
- The Council is restricted to using monies derived from its enforcement activities by s55 RTRA 1984 which prescribes the limited ways how these funds can be utilised.
- In connection with the procurement activity, Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) is likely to apply and the Council will be supporting the function by providing appropriate anonymised data to suppliers ahead of tender submissions. TUPE is likely to apply for services the Council will be bringing in house for self-delivery and officers will be seeking clarification as to the relevant data and associated terms and conditions including any required consultation ahead of transfer due end of July 2019.

### **8.3 Equalities Implications**

- This service delivery provision aligns to the EqIA associated with the Keep Newham Moving programme<sup>1</sup>. Specifically, the introduction and maintenance of Restricted Parking Zones (RPZs) which are enforced by this service contribute to the positive judgement of the following protected characteristics

### **8.4 Other Implications relevant to this report:**

- Based on our experiences with the current contract, there is a high staff turn-over and other associated HR factors that require dedicated and appropriate management and resourcing. The new contractor will need to address these important issues to ensure continuity and quality of service.

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<sup>1</sup> See Equality Impact Assessment - Keeping Newham Moving - A New Deal for our Roads (December 2016) section 5.

- Procurement – The Procurement Unit is working closely with Parking Enforcement and supports the approach being proposed. Permission to proceed was provided at Checkpoint 1 and the Strategic Investment Board (SIB).

## **9 Background Information used in the preparation of this report**

9.1 Options Appraisal;

9.2 Checkpoint process and panel response;

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## LONDON BOROUGH OF NEWHAM

### CABINET

<b>Report title</b>	Proposed procurement of general transport stores requirements for the Supply of Refuse Containers (Steel / Plastic) and Supply of Plastic Refuse Sacks	
<b>Date of Meeting</b>	<b>4<sup>th</sup> December 2018</b>	
<b>Lead Officer and contact details</b>	<b>Dave Adams (Transport Manager)</b> <a href="mailto:dave.adams@newham.gov.uk">dave.adams@newham.gov.uk</a> <b>Ext 34785</b>	
<b>Director, Job title</b>	<b>Simon Letchford (Director of Environment &amp; Community)</b>	
<b>Lead Member</b>	<b>Cllr Tripp, Cabinet Member for Environment and Highways</b>	
<b>Key Decision?</b>	Yes	Decision that will result in the Council spending or saving in excess of £500,000.
<b>Exempt information &amp; Grounds</b>	No	Amount of potential spend is likely to be exempt
<b>Wards Affected</b>	All	
<b>Appendices (if any)</b>	None	

### 1 Executive Summary

The purpose of this report is to seek Cabinet approval in accordance with contract standing orders for the council, to utilise a number of different purchasing consortiums, in order to procure a range of products by the stores management for subsequent use within community & environment.

### 2 Recommendations

2.1 For the reasons set out in the report, Cabinet, is recommended to agree:

2.1.1 Authority to proceed to procurement of both Refuse Containers & Refuse Sacks, through an existing EU-compliant framework.

### 3 Background

3.1 Previous procurement exercise was carried out in 2013, due to circumstances at the time, the tender was never awarded. New management was recently employed, who has now identified with procurement that previous contracts have expired some time ago.

- . Commercial / Domestic waste containers
- . Sacks / Bin Bags

- 3.2 An exercise has taken place to identify the best way forward in procuring these goods, it has been recognised that an efficient method of procurement would be to utilise existing EU-compliant framework agreements, tendered by various procurement consortiums. In such cases the suppliers will have already undergone rigorous examination to determine they are suitable suppliers, also able to provide products that are fit for purpose. By doing this, the council will be purchasing goods that meet our technical specifications from reputable suppliers, that in many cases are already suppliers to the London Borough of Newham.
- 3.3 A number of procurement consortiums manage framework agreements that are open to use by other local authorities, on evaluation the framework agreement that best suits our needs is the Eastern Shires Purchasing Organisation (ESPO).  
ESPO allow for mini tendering competitions, which will enable the council to invite competitive bids that meet our particular requirements.
- 3.4 By utilising this existing framework agreement, the council can significantly reduce the time and cost of procurement, the alternative being to undertake specific tender projects for each product range required.  
Additionally, should this recommendation be adopted, tenders or, in some cases, orders for goods can be placed immediately, as specific arrangements have been made with existing consortium suppliers.
- 3.5 By use of frameworks created for use by a number of public authorities, additional value for money / efficiencies can be achieved, as the individual cost is normally reduced through economies of scale.

#### **4 Key Considerations & Proposals**

- 4.1 The Council need to consider an approved way forward, in order to continue to procure these essential goods and offer best value.  
The current situation must be rectified as procurement policy / procedure has lapsed, due to previous management.
- 4.2 Any goods procured under the future arrangements, will be used solely by the operational areas, for which they were ordered. The use of the framework agreements permits the council to use more or less of the goods outlined. No commitment is made for the supply of any quantity or value, also no penalties are incurred, should the requirement of the council cease.
- 4.3 Although we are currently out of contract, we have ensured we receive a competitive / discounted price for the goods we currently purchase (bins / bags). The proposal is to invite suppliers through a mini-competition of the ESPO

framework, to participate in an E-auction, this would ensure best value for our specification of goods required, also would be the most efficient way of producing / highlighting any saving potential.

- 4.4 As the EU Directives does not permit the creation of framework agreements to last longer than 4 years, the potential spend for that period is shown below.

There will be 3 separate framework agreements or lots, relating to the provision of these good / services

<b>GOODS</b>	<b>Approximate Spend Per Annum</b>	<b>Potential Spend Over 4 Years</b>
Commercial & Domestic Metal Bins	£116,905	£467,620
Commercial & Domestic Plastic Bins	£120,887	£483,551
Plastic Sacks	£114,759	£459,038
<b>TOTAL APPROXIMATE SPEND</b>	<b>£352,551</b>	<b>£1,410,209</b>

## **5 Policy Implications & Corporate Priorities**

- 5.1 No policy implications are expected, our priority is to try and produce a saving, also to receive a high quality product. This will be identified & gained by the use of an E-auction process.

## **6 Alternatives considered**

- 6.1 Tender each individual product under EU procurement procedures, which is time consuming and will increase procurement costs.
- 6.2 Continue to spot purchase, this is time consuming and does not comply with EU regulations.

## **7 Consultation**

- 7.1 **Name of Lead Member consulted: Cllr Tripp: Date:** Oct 2018
- 7.2 Consultation has happened with the following, end users regarding specifications required. LB of Havering, to see if collaboration working was possible, Both Finance / Legal have been consulted, along with procurement.

## **8 Implications**

### **8.1 Financial Implications**

- 8.1.1 The utilisation of the framework will ensure compliance with procurement regulations and practices. The entering into these contracts are not expected to make significant saving, In fact the end result may be cost neutral. At present Directorates across the council pay for these goods from the existing budgets, this is done via the environment services stores system and therefore any savings / increased costs will be met by these clients.
- 8.1.2 A review of the outcome of the tendering process will be needed by Environmental Services to highlight any variation in the value of the contract, also to ascertain if there are any financial savings or risks. Any savings should be directed back to corporate balances

### **8.2 Legal Implications**

- 8.2.1 This report seeks Cabinet approval to commence the procurement process for the provision of refuse containers & refuse sacks (the "Goods").
- 8.2.2 The Council has a general power under section 1 of the Localism Act 2011 to do anything that individuals generally may do, including enter into the arrangements proposed in this report.
- 8.2.3 In November 2018, the (Checkpoint) Gateway Stage 01 review panel recommended approval to proceed with the intended procurement process, in accordance with the Contract Standing Orders (CSO) 9.1.1.
- 8.2.4 The relevant EU procurement financial threshold for goods is £181,302. The total value of the Goods is over the EU procurement threshold, and would generally necessitate that a Contract Notice be published in the Official Journal of the European Union (OJEU) as well as an advertisement on Contracts Finder. However officers intend to procure the Goods via an existing framework agreement which satisfies the OJEU advertising requirement.
- 8.2.5 Under section 2.5 [The Council's Powers of Delegation] of the Council's Scheme of Delegation the full Council may delegate its powers under s.101 (1) (a) of the Local Government Act 1972 (with some limited exceptions) to, inter alia, an officer.
- 8.2.6 This is a key decision subject to Part 4.5 Overview and Scrutiny Procedure Rules, (Rule 15) of the Newham Council Constitution (the "Constitution") and the Council's call-in procedure. This approval is sought in accordance with section 5.4 Protocol for Executive Working Arrangements of Part 5 [Codes and Protocols] of the Constitution.
- 8.2.7 The terms and conditions of the framework agreement are not detailed

within this report and should be reviewed by Legal Services prior to concluding the contract.

### **8.3 Equalities Implications**

8.3.1 The actions coming out of this report are unlikely to have any equality implications.

### **8.4 Other Implications relevant to this report:**

8.4.1 None

## **9 Background Information used in the preparation of this report**

9.1 An exercise has taken place (through the last procurement which was not awarded) to identify the best way forward in procuring these goods, it has been recognised and confirmed by myself and procurement, that an efficient method of procurement would be to utilise existing EU-compliant framework agreements, tendered by various procurement consortiums. In such cases the suppliers will have already undergone rigorous examination to determine they are suitable suppliers, also able to provide products that are fit for purpose.

By doing this, the council will be purchasing goods that meet our technical specifications from reputable suppliers, that in many cases are already suppliers to the London Borough of Newham.

9.2 Bins and bags are supplied as a statutory obligation to the residents, these include, recycling bags and plastic bins. All bins / bags supplied to commercial waste or any new build developments are recharged and an income is produced. There is also an amount of bags, which are supplied to some of the small business units, such as PRS, all goods which are requested by these businesses are recharged through the general stores.

**IF REQUIRED (Only where items were not included on the forward plan):**

**Reason for Urgency**



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