Planning Policy Team, London Borough of Newham

328 Barking Road, East Ham, London E6 2RT

By email to: localplan@newham.gov.uk

 15 February 2023

Dear Sirs,

**Newham Local Plan – Regulation 18 Consultation**

CPRE London is a membership-based charity with 2,500 members across London, concerned with the preservation and enhancement of London’s vital green spaces, as well as the improvement of London’s environment for the health and wellbeing of all Londoners.

**Newham has the least publicly accessible green space of any London borough and the Local Plan should tackle this problem head-on:**

1. **Policy H1.1** **All development should be on brownfield land.** This policy should state unequivocally that all protected green space and amenity green space will be retained as such, and that building on green spaces will not be supported in any circumstances. **All proposals / site allocations which propose building on green space should be deleted.** A number of Site Allocations incorporate proposals to build on green space: these should be deleted and/or revised to state that all amenity green space will be retained due to the acute shortage in the borough. Please see our specific comments on Sites Allocations below. More generally, the **plan should be revised to remove/edit any Site Allocations so no existing green space is lost**.
2. **Policy GWS1(1) and (2) should be revised to accommodate GAIN of green space (not simply *no net loss*) and to deliver adequate green space per person.** In particular, the policy “Developments on open space (excluding Metropolitan Open Land) will only be supported in exceptional circumstances”, lists an extensive set of circumstances. **A stronger statement is needed to protect local green spaces** e.g. “To ensure there is adequate provision of green space in the borough, no development on amenity green space will be supported except in very specific circumstances. The circumstances should be significantly restricted and emphasis placed more clearly on increasing the quantum and quality per person.”
3. **The plan should be revised to allow for creation of 70 hectares of new public open green space including two major (15 hectare) new parks (including sports pitches) in the east and west.** Newham has the least publicly accessible green space per person of any London Borough (0.71 Hectares per 1,000 people). The Plan proposes to maintain this ratio with the projected population growth which will mean creating at least 70 hectares of new green open space. The Plan, however, falls short of detailing where this will be located. The Local Plan should be specific as follows:
* **A MAJOR NEW PARK IN THE EAST:** The Leigh Road Sports Ground N13.SA3 should not be allocated in any part for housing and instead the entire site should be allocated for sports / park / recreation in line with its MOL status (extend MOL status to any sections not currently designated). This should connect to the site to the south – the green site to the east of Burges Rd (possibly owned by a charity) and it should all be included as a site allocation and given a clear identity as a major new park and nature reserve/habitat. This can become part of a new **River Roding Park** [***Edgelands***](https://riverrodingtrust.org.uk/edgelands/) and weurgeNewham to work with River Roding Trust and the community to make this a reality for future generations.
* **A MAJOR NEW PARK IN THE WEST:** N7.SA1 (partially MOL) – site north of Crows Road – this is allocated for residential, open space and community floorspace but no detail is given on proportions. This is well connected to neighbouring sites which are still green and it (or a significant part of it) should be set aside for a large green open space / habitat – connected with neighbouring sites etc. Added to this, N7.SA2 (designated a SINC) – the gas holder site in the west of the borough should be safeguarded for conversion to green open space. And the waterworks site at Abbey Lane / The Greenway should be opened up and allocated for an accessible green / open space.
1. **West Ham Park should be designated as a Local Green Space in its entirety** as it is currently under threat from development and is one of the few open spaces in this highly built-up part of the borough. The LGS status should include the site of the derelict greenhouses which should be retained as part of the park. More generally, **the Plan should designate all key public parks and open spaces as Local Green Space to ensure they are protected into the future.**

**Housing ‘targets’: there is a significant risk of over-allocation of land for new housing – land which could be used for other purposes e.g. to create sustainable transport hubs or new green/open spaces.**

1. **There is a large mis-match between the rate of housebuilding proposed and reality of (average) housing completions over recent years.** The proposed annual housebuilding rate was only achieved in two recent years. On average it significantly outstrips the market delivery rate of recent years:
* The predicted housing need per annum is roughly 3,050 each year for 17 years
* In the past 10 years the average net additional dwellings in Newham was 2,128 per year
* In the past 20 years the average net additional dwellings in Newham was 1,540 per year

See net additional dwellings Table 122 [here](https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing). **While we do not seek to challenge the figures for need, we must point out the implications of over-allocating land for housing** which is very unlikely, in reality, to be built. Generally, the over-allocation of land means a great deal of land which could be allocated for other important purposes will lie idle for up to 20 years. Targets should be set at lower, realistic levels to ensure land is not wasted and potential for creating new large parks and green spaces is not lost. Also, if and when green space sites are allocated for housing, the high likelihood is these will be built on first, before brownfield sites, undermining the brownfield first principle.

**ROADS – unnecessary large and complex road layouts are taking up very large amounts of space: a policy should be introduced to reduce road space and reallocate it to more sustainable uses.**

1. **Local transport strategy policy T2 should limit main roads to one lane only**, for general traffic, to support delivery of the Mayor’s Transport Strategy targets and reduce the negative impact of roads in terms of severance and health. Remaining space should be re-allocated for bus or cycle lanes, wider pavements, or SUDS / trees etc, or in certain circumstances, even built development. Specifically:
* Armada Way roads/roundabouts + Gallions Reach roads should be reconfigured
* The A1020 / A112 / Connaught Bridge road and roundabout layouts are excessively large in many places and could be reduced to one lane only in either direction (or one lane plus bus lanes or cycle lanes) and remaining space returned to green space or used for much needed housing.
* High Street / A11 should be reconfigured to reduce the impact and reallocate space for sustainable transport and SUDS etc. (Also the roundabout at Rick Roberts Way.)
* Newham Way / A13 – This should be allocated for reconfiguration in association with relevant agencies to reduce the impact of the road on surrounding neighbourhoods and reallocate space to sustainable transport / SUDS etc.
* Monfichet Road / Westfield Avenue – and other roads in this area should be narrowed for general cars and reallocated for with bus / emergency lanes / SUDS etc.

**Kerbside space in Newham is likely to take up over 200 football pitches worth of space – mostly public space – and, as such, a policy should be included in the Local Plan addressing how it is used.**

1. **A Kerbside Space policy should be introduced.** A huge amount of land is currently deployed as kerbside space – used mainly for parking private cars. Given the London Mayor’s Transport Strategy needs to underpin the Newham Local Plan, a policy should be included which recognised the importance of reallocating this space for sustainable uses which support both active travel and environment goals. Specifically, a policy should be included for reallocation of a minimum of 25% of Newham’s kerbside, referencing environmental and social goals and establishing an appropriate target for reinstating kerbside as a public space, to be used for everything from bus and cycle lanes, safe cycle storage, shared mobility parking, delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. as per Lambeth Council’s recent [Kerbside Strategy](https://moderngov.lambeth.gov.uk/documents/s142785/Appendix%20A%20-%20Lambeths%20Kerbside%20Strategy.pdf)); and supporting delivery hubs and shared mobility hubs (car share, bike share etc).
2. **Specific site allocation comments**
* N1.SA1 – since there is a clear need to mitigate air quality from the sewage plant, there should be a dense green barrier to the north, probably a strip of mini forest which can also act as part of a key green chain and important new habitat. (Note also that Policy HS1 (2a) states“Resisting incremental change to the composition of existing Gallions Reach Shopping Park, which remains an out of centre retail park” makes it unclear whether or not this site is allocated for development, which it does appear to be under Policy N1.SA1.)
* N8.SA7 – car park at Rick Roberts Way: support development here. However, though it includes plans for some green space, it’s not clear how much or what quality it will deliver? This should be clarified and delivered in line with a standard for green space / amenity open space per person and more generally the need to increase green/open space in the borough. The road should be narrowed for general traffic (e.g. bus or cycle lanes introduced) to reduce pollution and noise impact.
* N7.SA1 (partially MOL) – site north of Crows Road – this is allocated for residential, open space and community floorspace but no detail on proportions. This is well connected to neighbouring sites which are still green and it (or a significant part of it) could be set aside for a large green open space / habitat – connected with neighbouring sites. etc.
* N7.SA2 (designated a SINC) – gas holder site. This is allocated for “Residential development, industrial and employment uses, community and education uses, open space and town centre uses.” Again it is unclear how much will be retained and it feels like there is a huge opportunity to safeguard this in its entirety or at a minimum safeguard a large section for open space and/or habitat.
* N11.SA2 - vacant land and greenspace at Ferndale Street, E6 6FS. This is allocated for “Residential development with greenspace reconfiguration and re-provision. There should be no loss of open space.” However, it is difficult to see how ‘no loss of green space’ can be achieved with this site, if it is to be used for residential development. More generally, given the lack of green space in the borough, it should be retained for public green space.
* N11.SA3 –green space at Royal Road. This is allocated for “Education, residential and re-configuration of greenspace.” We believe this allocation should be deleted – this green space should not be built on and should be used to accommodate much needed recreation or sports needs.
* N10.SA3 Newham Leisure Centre site. Allocated for “Reconfiguration of leisure centre, car park and open space to provide a new leisure centre, residential and the re-provision of open space.”– This allocation is unclear about how much space will be retained as green space and more generally it is a proposal to build residential on green space which we strongly object to. This should not be allocated for residential development – if the leisure centre is to be reprovisioned, no green or open space (we including the very large car park) should be lost and car parking should all be returned to green space, with only disabled parking retained, to support sustainable transport targets.
* N10.SA2 - Newham Sixth Form college site. This is allocated for “Residential development and open space” We do not believe this site should be allocated for housing. The green/open space should be retained for its amenity value.

**Further comments:**

* **Beckton Sewage Works**. This should be maintained as protected MOL. The site has high ecological value: its perimeter is designated as a SINC and the parts of the Treatment Works are also identified as part of the Green Chain. This means that the site still fulfils objectives c and d of the London plans policy 7.17 on Metropolitan Open Land and should remain designated to protect the site’s biodiversity.
* **Housing estates, infill development and reconfiguring car-parking parking provision on estates** The Local Plan should include a policy for housing estate green spaces, stating that ‘infill’ schemes will ensure residents do not lose green space *per person*; building on estate green spaces will be resisted; if green space is lost it will be replaced and preferably enlarged; and that ‘grey space’ (parking / roads) on estates will be rationalised into specific locations allowing more to be converted to green space.
* **West Ham station** should be expanded / re-developed to cope with the likely extra volumes; the station is already struggling to cope with through traffic and is often an unpleasant environment.

Thank you for the opportunity to comment on this important consultation.

Yours sincerely,

Alice Roberts

Head of Campaigns

CPRE London