

# Local Plan (Refresh) Comments

"All space is occupied by the enemy. We are living under a permanent curfew. Not just the cops — the geometry" - [Raoul Vaneigem](#)<sup>1</sup>

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## Introduction

We start this characteristically (but badly, in my opinion) with *people at the heart of everything we do* nearly meaningless unless, for example, the borough abandons 'comms', slogans (*we are newham*, what does that even *mean*?) and start genuine open-ended<sup>2</sup> *real-time dialogues* and practise *listening*<sup>3</sup>.

Both documents are full of pretty pictures too, superfluous, patronising and (often) without relevance to the subject at hand.

So much 'comms' *pumped out* from the borough doesn't allow anything much to *get in*. This is a feature of of the local assemblies too, videos, presentations, technical glitches, reports, *anything except allow the residents time and space to freely discuss*. Any very abbreviated *discussions* that do take place are vectorialised (pace McKenzie Wark<sup>4</sup>) by officials, to shape and limit<sup>5</sup> the discussions and make sure *nothing too radical* can appear.

Also, *places and designs aren't people*, especially in the hands of *large architectural practices* and developers. We just need to look towards the City to validate that particular thought.

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1 [Raoul Vaneigem](#)

2 “The smart way to keep people passive and obedient is to strictly limit the spectrum of acceptable opinion, but allow very lively debate within that spectrum...” - Chomsky

3 [For example, active listening](#)

4 [Named for their control over vectors \(i.e. various pathways and networks over which information flows\)](#)

5 See footnote 2 redux.

The 15 minute neighbourhoods (*although I'm somewhat in favour of the concept*) will not start to produce a cycling and walking culture by themselves, in a borough where the *big car is status* and *only poor people cycle* (yes, I've discussed this informally), especially when the large car is driven very badly. Also Newham is not Paris<sup>6</sup>, this is rather obvious but there are consequences studied in detail here<sup>7</sup>. For example, I've almost given up cycling in Newham because of narrowed streets (and therefore continuous *close passes*) caused by parking and the *abominable standards of driving and parking*, speed and discourtesy from nearly all drivers. For example, no mention of a 20mph borough<sup>8</sup> or random raffles<sup>9</sup> on speeding, non-insurance and dangerous driving.

Next, no targets and no discussion of *measured ambition* as in a SMART<sup>10</sup> approach to projects. There's notions of biodiversity gain in the text, however the calculation and metric, documented here<sup>11</sup> is opaque and complex and, no doubt, *swiftly set aside* or forgotten. Here, I'm in favour of square area of tarmac (especially, it's black and therefore all wavelengths) removed<sup>12</sup>, auditable and published.

Its very difficult to compare and comment on the refresh (about 100 pages, nice pictures) with the plan (300 pages, more nice pictures) since the refresh isn't *presented integrally as a revision of the plan*. Also, on co-create the refresh has been *split up into sections*, a tacit acknowledgement that we're dealing with *siloes thinking*, rather than a whole. The language of the aspirations, whilst (genuinely) laudable is also still very abstract. Nearly meaningless 'happy' pictures are chosen instead of examples (for example, *examples of green or high tech ambitions*). Go 'comms'! (yes, now I am being sarcastic).

Last, timescale, it's going to take nearly half a decade (2024 as target) *to finalise the plan and submit for approval*, let alone *act* on some of it. Meanwhile, given my recent criticisms of the main document, unbridled development as usual? Yes, I'm aware that the drafting and review process may well *frame and orient material intent (a planner's words from a neighbouring borough)*, but, given expensive lawyers, I'm sure some of the developers and architects will do as they like, as usual, minimising S106 gains and and presenting factitious arguments (once they've started work!) about viability.

There are also potentially good CIL gains<sup>13</sup> too, but most of that opportunity has been currently dissipated, minimised and neutered by the current conceptual and procedural problems with the community assemblies<sup>14</sup>. This does not bode well for the future, especially at current snail's pace.

If I continue with this document later, I'll present some arguments later on about 'being incremental'<sup>15</sup> (pace Negro Ponte).

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6 I lived in a Paris suburb for most of my life, I am **very familiar** with the 75 postcode therefore

7 [Comparison of social structures within cities of very different sizes - Turing Institute Presentation](#)

8 [If we do it's not noticeable. Mayor's GLA question 28th February 2020](#)

9 [Police tactic used in France to keep criminals off-balance](#)

10 [Specific, Measurable, Assignable, Realistic, Time-related](#)

11 [The Biodiversity Metric 3.0 \(JP039\)](#)

12 [Yes removed, there are potential problems with cool pavements](#)

13 <https://www.gov.uk/guidance/community-infrastructure-levy#spending-the-levy>

14 <https://hughbarnard.org/wp-content/uploads/2021/07/neutering-the-participative-budget-v2.pdf>

15 [Being Digital - \(Good!\) Book by Negro Ponte](#)

## Detailed Commentary

### You Tell Us

*Here we go, I did. Not that you are 'listening'! I imagine, for example, that this consultation is more of a **statutory thing** rather than a desire to genuinely engage with the residents. After all we have 'engagement officers' to **prevent** that kind of stuff, don't we (pace Hunter S.<sup>16</sup> and Rest in Power)?*

We want the Local Plan to help create a borough where your hopes and aspirations can flourish. The cart is before the horse, we don't actually know those aspirations, do we, but we've made this anyway? We would like to know what you think the vision should include.

- Should the vision and objectives be framed around the Council's Towards a Better Newham: Recovery and Reorientation Strategy?

*It's very, very difficult to say, since there isn't much strategic content here, rather vague aspirations. As Dragon's Den:*

*Contestant: We are going achieve £1m in sales in the first year*

*Panel: **Show us where those sales are coming from** and how they are made.*

- Is there anything missing from the vision and from table 1 to ensure we meet Newham's needs?

*Coherence and precision, many **current acts conflict with vague aspirations**. Since none of this will be acted upon before 2024, I suppose we shouldn't really worry though.*

*Coherence: **Ensuring there is sufficient physical**, social, civic and digital infrastructure **and yet** Durning Hall, the largest community asset in Forest Gate is to be downgraded to the point of removal. So we don't **really** care about any of this.*

*Precision: Most of this is couched in wooden language and vague vocabulary: **activation principles** comes immediately to mind, but there's plenty more.*

We would also be very interested in your answers to the following questions, which will help shape the vision for the Plan.

- What do you think makes Newham special?

*Litter, fly tipping (I've done a great deal of work on this, too, so I'm in good faith), bad driving and continuing policy of 'surrender to the car, surrender to the parked car'. For 'surrender to the parked car' see the main feature of the Broadway, Morrison's car park.*

- What would make Newham a better place to live? To work or run a business? To grow up in?  
*De-emphasis of 'comms', complacency, defensiveness, replaced by genuine desire to listen, debate and imagine the future. Education (including the restoration of 'serious books' in the libraries<sup>17</sup>)  
Tools and structures to enable this. This is a meta-suggestion.*

- What are your hopes for the future of Newham?

*See above*

- What are your fears for the future of Newham?

*See above*

<sup>16</sup> [https://en.wikipedia.org/wiki/Hunter\\_S.\\_Thompson](https://en.wikipedia.org/wiki/Hunter_S._Thompson)

<sup>17</sup> <https://hughbarnard.org/wp-content/uploads/2021/10/library-451.pdf>

We are also interested in your views about how to best secure the delivery of this vision. (*really?*)

- Should we have one overarching policy which highlights what sustainable growth is in Newham? *First define all this (if you can) and set measurements and targets. There isn't really **good growth** or **sustainable growth** except in the minds of developers, consultants and architects.*

*Every decision and micro-decision needs a Kantian-style<sup>18</sup> filter though climate and green considerations. That's the only way of protecting the next couple of generations and providing useful prefiguration<sup>19</sup> for other boroughs. (I'm not a member of the Green Party at the moment by the way).*

- Should we have a set of objectives and ensure we deliver against the 5 principles and 8 pillars

*See above. But the five principles and eight pillars don't mean very much, they are vague aspirations. 'We' should have concrete objectives:*

1. *Genuinely discussed to see whether they make anyone 'happier'.*
2. *Co-governance and citizen's audit<sup>20</sup> to make sure that actions **towards** concrete objectives are taking place and actions **against** (see Durning Hall, Madison Square Gardens, Silvertown Tunnel etc.) are not taking place.*
3. *Tools for debate about any vision for the borough and incremental actions and objectives. In principle this would be co-create but it's clunky and **framed as nicey-nicey 'comms' not as dialogue.***

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These responses will be analysed and fed into the Plan and an engagement report will be produced so you can see how we have responded to each bit of feedback.

*Actually I believe that many of us would like to see all the collected raw feedback rather than the analysis, for obvious reasons.*

One key evidence base document is the Characterisation Study, which we have started developing with input from a wide range of residents and stakeholders.

*See above. Also the scope and table of contents of the study is not clear at this time (November 2021)*

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Adoption by the Council Autumn 2024

*Already commented on in the introduction, too little, too late.*

At future Plan stages we will also be completing a Habitats Regulation Assessment, which will consider the potential impact of the Local Plan on significant natural habitats.

*So some of the plan may stop being feasible. But at **which stage** is that?*

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18 "Act only according to that [maxim](#) whereby you can, at the same time, will that it should become a universal law."

19 [https://en.wikipedia.org/wiki/Prefigurative\\_politics](https://en.wikipedia.org/wiki/Prefigurative_politics)

20 <https://www.e-participatoryaudit.org/module-02/speaking-the-language-of-citizens-how-to-develop-a-citizen-audit-report.php>

Growth in the no. of businesses in the last 5 years in Newham has been nearly 80% higher than **comparator areas**, with business (including micro businesses) and the knowledge economy **amongst** key growth sectors

*Very upbeat, let's see the details though, are the comparators basket-cases, for example? Chicken shops have certainly increased? I can't see any visible knowledge economy?*

*Actually I'm not going to go right through the opportunities as all of them are 'can' and 'may', future contingents<sup>21</sup>.*

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*There's quite a bit of overlap in the five principles and eight pillars. None of this means very much until it can be **independently measured** with access to the raw results. SMART has gone missing.*

*A great deal of the plan is like this. 'xx% satisfaction' with High Streets that consist of chicken shops, litter, betting shops, and closed shops is unlikely, for example and also the **sources and more detailed data are missing**.*

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*I'm not going to go right through this, but it's soggy:*

Recognising the importance of health and well-being to ensure we reduce inequalities through a health integrated approach to planning

*That just seems like a fervent, but vague, wish doesn't it? Mortality profiles and hospital admissions would be a start. What does a **health integrated approach to planning** even mean?*

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Should the vision and objectives be framed around the Council's Towards a Better Newham: Recovery and Reorientation Strategy?

*Every action now needs to be filtered through a climate emergency question, as if we were strict Kantians, with a categorical imperative<sup>22</sup>.*

*With this, and everything else, we need **co-governance** to go with co-creation. That is, the residents need to be able see, participate and (to some extent) **audit** rather than consuming ever upbeat 'comms', the root of a great deal of cynicism, anger and apathy:*

***'I don't vote because nothing ever changes'**. I hear that incessantly in my informal vox-pops.*

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<sup>21</sup> [Things that 'may' be true in the future](#)

<sup>22</sup> "Act only according to that [maxim](#) whereby you can, at the same time, will that it should become a universal law."

*How to to keep the plan honest? How to see honest dialogue rather than 'comms' I'm not talking about a **carefully orchestrated talking shop**, twice a year, either.*

Is there anything missing from the vision and from table 1 to ensure we meet Newham's needs?

***Measurement** of success, timescales and **examples** not (often irrelevant) pretty pictures. Show that there's some **concrete thought** taking place. This is general criticism of both the refresh and the main document, **wooden language** and **persistent abstraction**.*

*I understand that there may be some reluctance to dare to make **concrete proposals**, since these are also, to some extent, speech acts<sup>23</sup>. However there's nothing at all that prevents examples as a basis for further thought and discussion.*

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15-minute neighbourhood forms a key pillar of Newham's COVID-19 Reorientation and Recovery Strategy to enable every resident to live in an accessible and inclusive neighbourhood which will provide all their social, civic and economic essentials.

*I'm probably one of the few Newham residents who was also a Paris (proche banlieue) resident. I lived for nearly 20 years in Les Lilas, 93260 on the Eastern edge of Paris. So a few remarks:*

*The **whole** of Paris (about 100 sq km) is only about 3 times as big as Newham (about 36 sq km), though we have to be careful about boundaries in the case of Paris. Dividing area by population and looking at built environment (no houses in the centre of Paris) **Paris is a great deal denser**.*

*Car ownership in Paris appears to be organically declining, though I need to check these figures<sup>24</sup>. It looks, anecdotally, to be expanding both in number and size in Newham.*

To address climate change the Local Plan Review needs to **focus growth** in locations that are easily accessed by public transport, walking and cycling. It will also need to **consider** the provision of and access to green space and how **development** can contribute to the building of a Green Economy, particularly at the Royal Docks.

*Since large practice architect are already involved in the characterisation study, see below, I'm guessing we are using development as a synonym for **building much more stuff**? **Focussing growth** but **considering green space**, says it all, really.*

*This above is far too timid. Most of **building more stuff** contributes to carbon dioxide (including significantly cement<sup>25</sup>), transport of materials, energy for firing bricks and so on. The most friendly approach to development (but not neutral) is **repurposing existing structures**. So, to be clear, this kind of **green growth is greenwash**.*

*Provision and access to green space is essential not just **considered**, including targets for depaving (rather than the complex, easy to game, biodiversity formulae).*

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<sup>23</sup> [Promises, apologies, utterances that do something](#)

<sup>24</sup> [Car ownership by year in Paris](#)

<sup>25</sup> [Cement is the source of about 8% of the world's carbon dioxide \(CO2\) emissions, according to think tank Chatham House.](#)

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The Characterisation Study will provide key evidence to inform the Local Plan Review. The Local Plan is currently comprised of **five neighbourhoods, each of which has their own policy**. The neighbourhoods either reflect a single or combined Community Neighbourhood Area. Community Neighbourhood Areas are groupings of Newham's wards for **community engagement and service delivery purposes**.

It will map the physical and functional character of neighbourhoods in the borough (such as how residents in each area move to access shops, spend leisure time, work or study), as they currently are and how neighbourhoods could evolve for the better.

The Characterisation Study is being prepared with the help of **consultants at McCreanor Lavington**, and through **extensive engagement with local communities**

*So much wrong with this that it deserves its own essay. It's **immediately siloed** (and then the silos are re-siloed, later on). Although I'm resolutely a bottom-up, subsidiarity person, it's clear that there should also be an imaginary<sup>26</sup> for the whole borough that informs the physical.*

*One concept could be **pervasive ideas and values associated with re-use** rather than consumerism. This kind of thinking cannot and should not be imposed but it can be encouraged, preferably not via architectural consultants.*

*Secondly the complete borough should be subject to a physical imagination exercise. For example (since there are no examples in the 'plan', such as it is) **give every primary school child a piece of paper and get them to draw the borough**. Same in secondary schools. After all, in this, we are honouring principle three.*

*In my personal view, the whole borough should end up looking green (and blue) rather than grey and brick coloured. Think **retro-fitted hyper garden city** or **rus in urbe**<sup>2728</sup>. We remember those, don't we? A few examples:*

- 1. The green web, mentioned in the plan but undefined, is probably 'good', **if only we could find out what it was**.*
- 2. See above, I've calculated that it would take about £250K to green wall the whole of the railway side of Forest Lane. Start with a small pilot segment to investigate the idea*
- 3. Hundreds of small and medium sized wasted plots of grass, mown and leaf blown need to be mapped and replanted. Actually as part of the Newham Meadows project<sup>29</sup> **we have half an eye on this already**. No point in waiting until after 2024.*

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<sup>26</sup> [Sociological imaginary](#)

<sup>27</sup> [The country in the city](#)

<sup>28</sup> [Proposed by myself at the end of this essay.](#)

<sup>29</sup> [Newham Meadows project website](#)

4. *Real living walls (as opposed to the diseased minimal token at the end of Cann Hall Road) and roofs everywhere possible. It shouldn't need the (highly flawed, over complex) participatory budget*

5. *Grants (and perhaps local fiscal pressure?) to depave front gardens and plant hedges removing walls.*

6. *Stands and corridors of mature (yes, one can buy them for £400 odd) broad canopy trees in avenues rather than random tokenistic, photo-op whip and cheap-tree planting. Actual care and maintenance for existing trees and good (silver birch, for example, happy that there's now apparently a tree officer, slight progress) anti-pollution choices. Not much point (or shade) in low value, small canopy street trees, water stress etc. will probably kill them in our 'new' summers anyway.*

So, as one can see, there **can** be 'examples'.

*Incidentally this imposition of Community Neighbourhoods (they're called libraries, even though they're nearly devoid of substantial books<sup>30</sup>) and engagement is positively Orwellian, if we genuinely had either of those, we wouldn't need the words, would we?*

*In this spirit the 'Arc of Opportunity' is, I guess an opportunity for **architect and developer profit** at the cost of the inhabitants? Colour me cynical, but see also, my investigations of the main plan document here<sup>31</sup>. Much of the language is 'revelatory'.*

We know from recent engagement activities that the current **spatial distribution of growth** can lead to some residents feeling left out of the opportunities provided by recent **large scale development**

*Here we see it again, growth and growth as defined by adding to the build environment, hence cement, transport, developers and architects.*

*"The residents have been consulted and their views incorporated," **said no large scale developer, ever, see Madison Square Gardens.***

The London Plan requires boroughs to follow a design-led approach to establish **optimise site capacities for site allocations**

***This, of course, is where it all 'breaks'**, the Sir Humhprey-esque vague language and the pressure from the top to impose 'targets' on the borough. Also who has ever seen anything in the UK that has been **planned sensibly on a ten year timescale**<sup>32</sup> (though they manage that in France and Germany<sup>33</sup>).*

*A non-residential current example of top-down, **grey push** (my phrase) is, of course, the Silvertown Tunnel<sup>34</sup>, tons of new embodied carbon, more traffic, more pollution. Don't we need to keep it **inconvenient** to drive into town?*

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30 [This is my essay about the 'missing' books of Newham \(and elsewhere?\)](#)

31 [Newham Local Plan: Partial Commentary](#)

32 [Book - What we have lost](#)

33 [Example: Orsec-Novis Plan](#)

34 [Silvertown tunnel, you know, for 'congestion'](#)

## **The Citizen's Plan**

*I'm over 3000 words now, **not going to be listened to or paid for this work**, so I'll submit and publish here.*

*As with, Independent Sage, we probably need a genuinely wide consultation followed by a Citizen's Plan. A great deal of this is just comms and pictures.*

*I have some keywords already, **incremental, interstitial, involved**.*