



**Gypsy & Traveller Accommodation DPD**

# **Integrated Impact Assessment**

Submission Version

September 2016

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# 1 Introduction

## What is the Gypsy & Traveller Accommodation DPD?

- 1.1 The Gypsy and Traveller Accommodation DPD (GTADPD) is a Development Plan Document to be used in conjunction with other documents of the Local Plan. Newham's Local Plan currently comprises the Core Strategy (2012), saved UDP policies, and the Joint Waste Development Plan for East London (2012). In addition, the Detailed Sites & Policies DPD (December 2015) has been submitted to The Planning Inspectorate for examination and thus has material weight; full adoption is expected in autumn 2016.
- 1.2 The GTADPD adds further policy to the Local Plan on the issue of Gypsy and Traveller accommodation needs to ensure that a range of specialist accommodation provision is fully considered, as required by the Equalities Act 2010.

## What is an Integrated Impact Assessment?

- 1.3 An Integrated Impact Assessment (IIA) fulfils statutory requirements for the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of all plans and programmes subject to preparation or adoption by an authority (local, regional, and national). The IIA approach incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations. An IIA also fulfils any requirements for Health Impact Assessment, Equalities Impact Assessment, and Habitats Regulations Assessment screening. The integrated approach avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of work.
- 1.4 Based on the 2005 ODPM document A Practical Guide to the Strategic Environmental Assessment Directive, the main stages of impact assessment are:
  - A) Set the context and objectives; establish baseline and decide scope
  - B) Develop / refine options and assess effects
  - C) Prepare the (IIA) report
  - D) Consult on the draft plan and IIA
  - E) Monitor effects of the plan

## 2 The IIA Process

### Required Stages

2.1 The stages needed for effective impact assessment of plan documents are identified in the table below along with reference to where each stage has or will be carried out.

Required stages for effective IIA	Found in?
<p><b>Set the context and objectives, establish baseline, decide scope</b></p> <p>A1 - Identify other relevant policies, plans and programmes            A2 - Collect baseline information            A3 - Identify sustainability issues and problems            A4 - Develop the IIA framework            A5 - Consult on the scope of the IIA</p>	IIA Scoping report (March 2016)
<p><b>Develop and refine options, assess effects</b></p> <p>B1 - Test the DPD objectives against the SA framework            B2 - Develop the DPD options            B3 - Predict the effects of the DPD            B4 - Evaluate the effects of the DPD            B5 - Consider ways of mitigating adverse effects / maximising beneficial effects            B6 - Propose measures to monitor the significant effects of implementing the DPD</p>	Issues & Options versions, GTADPD and IIA (April 2016)
<p><b>Prepare the Impact Assessment Report</b></p>	ongoing
<p><b>Consult on the draft DPD and IIA</b></p> <p>D1 - Allow for public participation in drafting of the DPD and IIA            D2 - Assess significant changes            D3 - Make decisions and providing information</p>	'Reg.18' & 'Reg.19' consultation, GTADPD and IIA (Apr/Jun 2016 + Jun/Jul 2016)
<p><b>Monitor the significant effects of implementing the DPD</b></p> <p>E1 - Finalise the aims and methods for monitoring            E2 - Respond to adverse effects</p>	Adoption and monitoring (ongoing)

## IIA Objectives

2.2 The relevant plans, baseline information, and sustainability issues that inform the framework of IIA objectives given below were explored in the Scoping Report (**Appendix 1**). As such the Scoping Report and its associated consultation comprise stage A (A1 to A5) of the methodology outlined above.

2.3 Note that Historic England comments received at regulation 18 stage (**Appendix 2**) clarified that two documents referred to have been updated by subsequent versions:

- The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning: 3 (March 2015)
- Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016)

The change should be noted but does not alter the framework of relevant IIA objectives; heritage is considered under objective 13 as below.

IIA objectives
1. To reduce poverty and promote equality of opportunity
2. To support healthier lifestyles
3. To create successful neighbourhoods
4. To ensure people have access to a choice of good quality, well located housing that meets their needs
5. To foster sustainable economic growth
6. To ensure inclusive access to a range of high-quality community facilities and open space
7. To promote resource-efficient development, design and construction
8. To improve air and water quality
9. To increase the proportion of journeys made by sustainable modes of transport
10. To reduce the amount of waste requiring final disposal whilst promoting the proximity principle
11. To minimise and reduce flood risk
12. To enhance and protect existing habitats and biodiversity
13. To enhance character, protecting, conserving and enhancing heritage and other character assets

## Results of scoping consultation

- 2.4 Details of the Scoping Report consultation are presented in part A5 (page 28) of that document. In addition to the identified consultation bodies (Environment Agency, Natural England and Historic England), Public Health, the Clinical Commissioning Group (CCG), and the London Enterprise Panel were notified as per LBN’s Statement of Community of Involvement (2015).
- 2.5 Responses were received from Natural England, the Environment Agency, and the CCG. These are attached in full as **Appendix 3**. Comments received are summarised below along with any resulting effect on the IIA process:

Respondent	Comments	LPA Notes
Environment Agency	<p>Makes recommendations specific to site appraisal which will be relevant (to the DPD itself rather than the IIA) if option 3(a) is taken forward.</p> <p>Notes that the Thames River Basin Management Plan has been updated.</p>	<p>No impact on current IIA stage, consider advice in further drafting of policy and associated implementation text.</p> <p>Refer to 2016 Thames RBMP not 2009.</p>
Natural England	<p>Advises that ‘Policies, Plans, Strategies relevant to the IIA’ should include 1) The Wildlife and Countryside Act, and 2) The Natural Environment and Rural Communities Act (NERC).</p> <p>Notes that it would be helpful if the spatial portrait included information regarding the environmental condition of the Borough, e.g. green space provision and the number of wildlife sites.</p> <p>Suggests GI should be included as an objective or explicitly incorporated into objective 6.</p> <p>Advises that the IIA objectives marked as incompatible in section 6 may not be so - i.e. that biodiversity improvements can be incorporated into development and that open space (6) is ‘ideal’ in creating habitat provision through GI.</p>	<p>Alter table for final stage. Additions are not expected to affect outcomes of appraisal.</p> <p>This information is available within the Local Plan itself (Core Strategy and DSPDPD)</p> <p>GI is considered to be incorporated under objectives 6 and 12, wording to be altered in final version to incorporate use of the terminology.</p> <p>Review objective compatibility in final version.</p>

Clinical Commissioning Group	Notes that process scoped covers equalities impacts and health / access to health for all. Concern over the need to highlight the multiple barriers that would be faced by (for example) disabled / vulnerable people within an already disadvantaged community. Suggests exploration of mitigation options.	The Equalities Checklist (attached to this document) serves to consider impacts of options scoped on protected groups including disabled persons, and those who have more than one protected group status as the checkpoints are cross cutting. Results do not indicate any significant or unmitigated negative equalities consequences but mitigation would be considered at a later stage of the IIA process if this assessment were to change.
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## Results of Regulation 18 & 19 consultation

- 2.6 Details of the regulation 18 & 19 consultation procedures are published in the accompanying Statement of Consultation (SoC). Two representations relevant to the IIA were received at reg. 18 and repeated at reg. 19. Historic England’s submission is summarised and referenced in paragraph 2.3 above.
- 2.7 As the LGTU’s comments related mainly to the GTADPD itself and not the IIA, these are primarily dealt with in the SoC. However, a minor amendment was made to the Equalities Impact Assessment (EqIA) found in section 4 below as a result of regulation 18 consultation comments. Though it did not alter the conclusion of the EqIA, the wording in relation to the specialist housing checkpoint (13) was updated to clarify how the policy framework as a whole addresses the needs of non-travelling and travelling Gypsy Travellers, making clear that delivery, as with the rest of the population, is dependent on providers.
- 2.8 Following Reg. 19 consultation the only amendment to policy H8 was an additional cross reference to existing policy SP5. As this is not expected to alter the impact of the GTADPD, no further alterations to the policy appraisal (set out in Section 3) or the Equalities Checklist were made.

## Assessment System

Expectation	Symbol	Comment
Major positive effect	++	The alterations contribute <u>significantly</u> to the achievement of the objective
Minor positive effect	+	The alterations contribute to the achievement of the objective, but not significantly
No effects	0	The alterations do not have any effect on the achievement of the objective

<b>Minor negative effect</b>	-	The alterations detract from the achievement of the objective, but not significantly
<b>Major negative effect</b>	--	The alterations detract <u>significantly</u> from the achievement of the objective
<b>Uncertain effect</b>	?	The alterations have an uncertain effect on the achievement of the objective

Note that effects may be assessed as uncertain if there is insufficient information available to determine a score. Some policies may also have both positive and negative effects on the objective, and where this is the case an explanation is provided.



### 3 Appraisal of the DPD

- 3.1 As the GTADPD does not allocate any sites there is not considered a need for a full Habitats Regulation Assessment. The context has not changed significantly since the appraisal of the Council's recent Detailed Sites & Policies DPD, which similarly concluded that given the distance to the nearest Natura 2000 site (Epping Forest) no HRA impacts were expected. Natural England's response letter of 25/05/2016 raises no objection to the GTADPD or associated IIA.
- 3.2 Policy H8 of the Submission Draft Gypsy and Traveller Accommodation DPD (GTADPD) aims to understand and allow for facilitation of the accommodation needs of a diverse population; specifically that which suits the cultural and lifestyle patterns of nomadic Gypsy and Travellers. In doing so, the policy aims to address the balance between competing needs expressed locally, ensure quality design and appropriate access to infrastructure provision, as part of the delivery of sustainable, mixed and balanced communities. The GTADPD also responds to the Council's statutory duty, under the Equalities Act 2010, to meet the accommodation and cultural needs of Romany and Irish Travellers (a protected group) insofar as they meet the definition for planning purposes set out in the national Planning Policy<sup>1</sup>. As with other constituent documents in the Local Plan, this DPD is to be read in conjunction with the Local Plan as a whole. In this regard, other policies such as H3 and H1 address the needs of those Gypsy-Travellers that don't meet this definition.
- 3.3 The table overleaf assesses the policy against the established IIA objectives, which include health impact considerations, and seeks to draw conclusions regarding expected effects.

#### Summary

Local Plan policies in relation to new housing have previously been appraised to have an overall positive effect on sustainability objectives. This is reinforced by additional policy H8 which has the potential to contribute to the achievement of quality place-making and accommodation, and promote equality objectives. Overall the draft policy will contribute to the positive outcome of the assessment/mitigation of any possible negative impacts, and as such are seen to be no less desirable within the context of this appraisal than others.

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<sup>1</sup> Currently Planning Policy for Traveller Sites 2015

IIA Objective	Comments	Prediction*
1. To reduce poverty and promote equality of opportunity	<p>The Local Plan Core Strategy provides a strong policy framework in support of this objective. Additional policy concerned with design of new development aim to promote the Council's Resilience agenda and its long term strategy to reduce poverty and promote equality by improving housing options and environmental quality.</p> <p>Draft policy requires new sites/pitches to be supported by sufficient infrastructure. This in turn may improve opportunities by providing groups with better access to supporting facilities.</p>	+
2. To support healthier lifestyles	<p>Draft policy aims to promote housing quality for a specific type of specialist accommodation, linking to existing Local Plan policy that promotes healthy neighbourhoods aiming to reduce health inequalities.</p> <p>The document would require new sites/pitches to be supported by sufficient infrastructure. This in turn may improve opportunities by providing groups with better access to supporting facilities and encouraging the use of sustainable modes of transport.</p>	+
3. To create successful neighbourhoods	<p>Draft policy seeks to create more successful neighbourhoods in considering accommodation quality and the impacts of development on neighbourliness. H8 accords with the spatial strategy's facilitation of social inclusion and the achievement of an active and connected Newham by ensuring access to adequate infrastructure provision.</p>	+
4. To ensure people have access to a choice of good	<p>Draft policy H8 directly seeks to ensure that the needs of Gypsies, Travellers and Travelling Showpersons are considered and that appropriate forms of accommodation are provided</p>	+

quality housing that meets their needs	where the need for such accommodation has clearly been demonstrated and this aligns with the spatial vision, also requiring quality and access to supporting infrastructure given due consideration.	
5. To foster sustainable economic growth	Policy does not directly address local economy or the promotion of employment generating uses, thus no direct impact envisaged.	/
6. To ensure inclusive access to a range of high-quality community facilities and open space	Draft policy seeks to ensure residents would have walkable access to supporting infrastructure which would include education, healthcare and other community facilities provision.	+
7. To promote resource-efficient development, design and construction	No impact envisaged; draft policy does not preclude the application of other policies concerning sustainability to proposed built form.	/
8. To improve air and water quality	Minor positive impact may result from the locational accessibility to services and facilities policy criterion, reducing the need to travel by car.	+?
9. To increase the proportion of journeys made by sustainable modes of transport	Minor positive impact may result from the locational accessibility to services and facilities policy criterion, reducing the need to travel by car.	+?
10. To reduce the amount of waste requiring final disposal whilst promoting	As with any new development an increase in waste arising may occur. Mitigated through application of good waste management facilities and management plan as sought by policy.	?x

the proximity principle.		
11. To minimise and reduce flood risk	No impact envisaged; the draft policy does not preclude the implementation of other policies concerned with flood risk.	/
12. To enhance and protect existing habitats and biodiversity	No direct impact envisaged; the draft policy does not preclude the implementation of other policies concerned with biodiversity enhancement and protection.	/
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Minor positive impact may result the seeking of quality accommodation, design sensitive to local character, and neighbourliness, which in turn may have an impact on overall character and assets. The draft policy does not preclude the implementation of other policies concerned with heritage and character impacts.	+?

\*short-term impacts

## Summary

IIA Objectives	1	2	3	4	5	6	7	8	9	10	11	12	13
	<i>Poverty &amp; equality</i>	<i>Healthier lifestyles</i>	<i>Successful neighbourhoods</i>	<i>Housing need</i>	<i>Economic growth</i>	<i>Community facilities</i>	<i>Resource efficiency</i>	<i>Air/ water quality</i>	<i>Sustainable transport</i>	<i>Waste reduction</i>	<i>Flood risk</i>	<i>Biodiversity</i>	<i>Heritage / character</i>
H8 Gypsy and Traveller Accommodation	+	+	+	+	/	+	/	+?	+?	?x	/	/	+?



## 4 Equalities Checklist

The London Borough of Newham is an obviously diverse borough, both in terms of the cultures and livelihoods of its residents as well as its broad range of distinct and vibrant environments. In many respects therefore, planning and development can be seen to respond well to diversity already, however, in reality, diversity represents an ongoing management challenge within the urban environment and within planning. Failure to explicitly acknowledge it, and the less obvious associated potential equalities issues, would be to risk the disintegration of social cohesion, disruption of the opportunities for people to achieve their potential, and the ability to make Newham a better place.

Generally we can see that in response to an explicit acknowledgement of the need to manage diversity and an analysis of the potential equalities issues by equality group, the key spatial interventions in addition to regeneration that are indicated are of 4 types:

1. Regulatory – to prevent disproportionate harm **Red in the table below**].
2. Provision, or enablement of provision for specific needs where appropriate within cohesion agenda **Yellow**].
3. Provision for mechanisms to access mainstream opportunities **Blue**].
4. Priorities within general themes that will particularly benefit equalities groups as well as the wider population **Green**].

These relate to the various legislative duties which seek to manage distributional effects (uneven outcomes), prevent discrimination and ensure equality of opportunity, social inclusion and cohesion.

From the analysis in the paper ‘Equalities and the Local Development Framework’, a series of checkpoints was distilled for the Local Plan. These are summarised in the matrix below, with the colour coding linking back to the type of intervention above as indicated. [In some cases categories overlap; where this is the case the text is one colour and the shading the other, with the shading being the more significant].

The Gypsy and Traveller Accommodation DPD (GTADPD) as scoped, responded to a number of equalities checkpoints that have already been addressed by the Local Plan Core Strategy and Detailed Sites and Policies DPD, however as the GTADPD seeks to further policy on specialist housing, ensuring recognition and facilitation of the accommodation needs of a protected group, it must still be assessed in terms of equalities impacts on other groups across the borough. In general, all equalities groups, along with the wider population, should benefit from the interventions suggested by the checkpoints. This is true of the GTADPD policy which, whilst targeted at the specialist housing needs of this particular equalities group, also support broader objectives of high quality design, accessibility, healthy urban planning etc., and seek to balance the need for specialist accommodation (of a specific type) against that of mainstream conventional housing, aiming to inject

consistency and proportionality for the wider benefit. In carrying forward the direction of travel clearly set out in the GTADPD Issues and Options consultation (aside from ‘do nothing’) the results of the assessment are unchanged when considered against draft policy. Overall the results of the assessment, set out in the table overleaf are considered to be satisfactory and do not indicate any significant or unmitigated negative equalities consequences. A number of EqIA checkpoints are not relevant to the GTADPD due to its highly focussed scope.

**Summary Checklist for consideration through the Local Plan to ensure equality of opportunity, social and environmental justice and social inclusion and cohesion – as applied at GTADPD Issues and Options Stage and as all policy options scoped have been carried forward, Proposed Submission.**

Check Point	Equalities Groups Particularly Relevant To (as discussed above) [NB In many cases all groups in fact will benefit]							CHECK OPTIONS STAGE (all carried forward to Proposed Submission)
	Older people, disabled people, carers	BAME people & recently arrived migrants	Gypsy-travellers	People of Faith	Young People	Women, incl. lone parents /FT home-makers	LBGT people	
1. A more robust approach to environmental impact, with greater attention to community engagement, cumulative, health and distributional effects and more stringent mitigation and separation of uses	+	+	+	+	+	+	+	Checked – overarching Local Plan policy promotes higher quality design and housing standards, inclusive of better management of social and environmental impacts and management of bad neighbour uses. Policy options as scoped further incentivise high quality design/neighbourly development in place-making and ensure environmental

Check Point	Equalities Groups Particularly Relevant To (as discussed above) [NB In many cases all groups in fact will benefit]							CHECK OPTIONS STAGE (all carried forward to Proposed Submission)
	Older people, disabled people, carers	BAME people & recently arrived migrants	Gypsy-travellers	People of Faith	Young People	Women, incl. lone parents /FT home-makers	LBGT people	
								considerations are assessed as part of site suitability.
2. Provision for truly public spaces/public realm (including adequate management/maintenance) and inclusive facilities	+	+	+	+	+	+	+	Checked - policy as drafted addresses inclusivity in design and access terms, though the nature of a gypsy-traveller site is that (as with any residential curtilage) it would be semi-private and in this case for a particular group due to their particular cultural needs. Neighbourliness criterion would nonetheless seek integration with the wider public realm and surrounding development.
3. Improvements to cross-boundary connectivity				+			+	Not within the scope of this DPD; dealt with elsewhere in the Local Plan.
4. Designing out, [or re-designing to reduce] crime and fear of crime	+	+	+	+	+	+		Checked – policy as drafted addresses crime/fear of crime



Check Point	Equalities Groups Particularly Relevant To (as discussed above) [NB In many cases all groups in fact will benefit]							CHECK OPTIONS STAGE (all carried forward to Proposed Submission)
	Older people, disabled people, carers	BAME people & recently arrived migrants	Gypsy-travellers	People of Faith	Young People	Women, incl. lone parents /FT home-makers	LGBT people	
								through quality design and neighbourliness specifications.
5. Clear guidance on where and how new faith infrastructure is likely to be acceptable to meet local needs, whilst also facilitating the multi-use of new and existing community infrastructure or other appropriate spaces, co-development/ownership and an understanding of the logic of a community-cohesion approach, to ensure exclusive spaces are minimised.		+		+				Not within the scope of this DPD; dealt with elsewhere in the Local Plan.
6. Accessibility-based approach to infrastructure planning, ensuring all types of housing have good infrastructure access (including to green space) or at least good low cost transport connections	+	+	+		+	+		Checked – consideration of access to strategic and local infrastructure are a clear component of policy as drafted.

Check Point	Equalities Groups Particularly Relevant To (as discussed above) [NB In many cases all groups in fact will benefit]							CHECK OPTIONS STAGE (all carried forward to Proposed Submission)
	Older people , disable d people , carers	BAME people & recentl y arrived migrant s	Gypsy- travelle rs	People of Faith	Young People	Wome n, incl. lone parents /FT home- makers	LBGT people	
7. Promotion of clustering and multi-use of community infrastructure facilities, including flexible re-use of otherwise redundant spaces	+	+		+	+	+		Not within the scope of this DPD; dealt with elsewhere in the Local Plan.
8. Support for low cost transport modes	+	+	+	+	+	+		Checked – walkability in access terms is a consideration in design and access terms in the policy as drafted.
9. Increasing and diversifying job opportunities, both in absolute terms and through local labour agreements	+	+	+	+	+	+		Not within the scope of this DPD; dealt with elsewhere in the Local Plan
10. Child/day care provision/enablement	+	+	+	+	+	+		Not within the scope of this DPD; dealt with elsewhere in the Local Plan.
11. Higher environmental and quality (especially space) standards in housing	+	+			+	+		Checked – a key component of Local Plan housing policy seeks improvement in accommodation quality and sustainability. This is

Check Point	Equalities Groups Particularly Relevant To (as discussed above) [NB In many cases all groups in fact will benefit]							CHECK OPTIONS STAGE (all carried forward to Proposed Submission)
	Older people, disabled people, carers	BAME people & recently arrived migrants	Gypsy-travellers	People of Faith	Young People	Women, incl. lone parents /FT home-makers	LBGT people	
								carried forward within the further specialist housing policy as drafted.
12. Support for training and employment intermediaries	+	+	+	+	+	+		Not within the scope of this DPD; dealt with elsewhere in the Local Plan.
13. Provision for affordable housing and specialist housing needs, (including non-conventional housing and family housing) within genuinely mixed communities, securing as much mainstreaming of adaptations as possible. Some clustering of specialist housing for certain groups may be appropriate.	+	+	+	+	+	+	+	Checked – policy in conjunction with other Housing policies (e.g. H3, H2, H5) recognises the need for a specific type of specialist accommodation, seeking to balance this need (as defined by national policy) against that of mainstream housing, whilst ensuring it is provided in reference to the specific needs of the group in question, and integrated with that of its neighbours. Delivery of such provision is dependent on the activity of relevant

Check Point	Equalities Groups Particularly Relevant To (as discussed above) [NB In many cases all groups in fact will benefit]							CHECK OPTIONS STAGE (all carried forward to Proposed Submission)
	Older people, disabled people, carers	BAME people & recently arrived migrants	Gypsy-travellers	People of Faith	Young People	Women, incl. lone parents /FT home-makers	LBGT people	
								providers/private initiative as with other specialist/affordable housing types.
14. Ensuring that publicly-accessible facilities are visible and obvious within the urban context	+	+						Not within the scope of this DPD; dealt with elsewhere in the Local Plan.
15. Application of principles of healthy urban planning focused on healthy lifestyles	+				+			Checked – policy criteria reinforce the requirement to promote the healthy urban planning agenda (under Successful Places SP2 and Infrastructure themes already within the Local Plan) in relation to housing quality and access to infrastructure provision for specialist accommodation.
16. Acknowledgement of the importance of particular locations for specialist ethnic shopping and services in planning and managing change in these locations		+		+				Not within the scope of this DPD; dealt with elsewhere in the Local Plan.

Check Point	Equalities Groups Particularly Relevant To (as discussed above) [NB In many cases all groups in fact will benefit]							CHECK OPTIONS STAGE (all carried forward to Proposed Submission)
	Older people , disabled people , carers	BAME people & recently arrived migrants	Gypsy- travellers	People of Faith	Young People	Women, incl. lone parents /FT home- makers	LBGT people	
17. Provision for appropriate levels of disabled persons' parking	+							Checked. This is a matter that would be dealt with through application of parking policy and needs assessment.
18. Consideration of targeting investment in housing and infrastructure improvements in most deprived areas	+	+	+	+	+	+	+	Not within the scope of this DPD; dealt with elsewhere in the Local Plan.
19. Acknowledgement of the importance of smaller shops as places of business, employment and social interaction for BAME groups in planning change that affects these.		+						Not within the scope of this DPD; dealt with elsewhere in the Local Plan.

# **Integrated Impact Assessment Scoping Report**

## **Gypsy & Traveller Accommodation DPD**

March 2016

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## Introduction

### What is the Gypsy & Traveller Accommodation DPD?

- 1.1 The Gypsy and Traveller Accommodation DPD (GTADPD) is a Development Plan Document to be used in conjunction with other documents of the Local Plan. Newham's Local Plan currently comprises the Core Strategy (2012), saved UDP policies, and the Joint Waste Development Plan for East London (2012). In addition, the Detailed Sites & Policies DPD (Submission Version, December 2016) is currently under examination by The Planning Inspectorate, scheduled for adoption in summer 2016.
- 1.2 The GTADPD adds further policy to the Local Plan on the issue of Gypsy and Traveller accommodation needs to ensure that a range of specialist accommodation provision is fully considered, as required by the Equalities Act 2010.

### What is an Integrated Impact Assessment?

- 1.3 An Integrated Impact Assessment (IIA) fulfils statutory requirements for the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of all plans and programmes subject to preparation or adoption by an authority (local, regional, and national). The IIA approach incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations. An IIA also fulfils requirements for Health Impact Assessment, Equalities Impact Assessment, Habitats Regulations Assessment, and the Flood Risk Sequential Test. The integrated approach avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work, benefitting from a shared understanding of policies and requirements.
- 1.4 Based on the 2005 ODPM document A Practical Guide to the Strategic Environmental Assessment Directive, the main stages of impact assessment are:
  - A) Set the context and objectives; establish baseline and decide scope
  - B) Develop / refine options and assess effects
  - C) Prepare the (IIA) report
  - D) Consult on the draft plan and IIA
  - E) Monitor effects of the plan

### What is the purpose of a Scoping Report?

- 1.5 This Scoping Report responds to stage 'A' of the IIA process identified above and provides opportunity for environmental consultation bodies to comment on the appraisal process proposed by the Council. As per the Environmental Assessment of Plans and Programmes Regulations 2004 the specified consultation bodies are Natural England, Historic England, and the Environment Agency. Regulation 12 explains that 'when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies' for a period of 5 weeks.



## The IIA Process

### The move towards Integrated Impact Assessment

- 2.1 The IIA approach incorporates the statutory requirements of Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). In addition to these requirements, the IIA will also consider health, equalities, and community safety.
- 2.2 Sustainability Appraisals 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). The processes have been merged to allow for a single joint appraisal to be carried out.
- 2.3 The statutory provisions for SA and guidance for its development were previously set out in the 2005 ODPM guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' and subsequently in the 2009 DCLG 'Plan Making Manual'. These have since been superseded by the introduction of the National Planning Policy Framework in 2012 (NPPF) and National Planning Practice Guidance in 2014 (NPPG) (the relevant section of the NPPG is titled 'strategic environmental assessment and sustainability appraisal'). This IIA is consistent with current guidance however the methodology used is similar to that set out in the earlier ODPM document for the purposes of consistency with the previously completed Core Strategy SA.
- 2.4 SA is an integral part of good plan making and should not be seen as a separate activity. Its purpose is to promote sustainable development by integrating sustainability considerations into plans. By testing each plan policy against sustainability objectives, the IIA assesses and reports the likely significant effects of the plan and the opportunities for improving social, environmental and economic conditions by implementing the plan.

### Habitats Regulations Assessment

- 2.5 The IIA will incorporate Habitats Regulations Assessment (HRA) to meet Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the 'Habitats Directive'). The Directive seeks to provide legal protection of habitats and species that are of European significance. Specifically, it establishes a network of sites throughout the European Union known as *Natura 2000*. The Directive requires that any plan or project not directly connected with or necessary to the management of a designated habitats site, but likely to have a significant effect thereon, either individually or in combination with other plans or projects, is to be subject to a Habitats Regulations Assessment (HRA) of its implications for the site in view of the site's conservation objectives. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects. In October 2005 the European Court of Justice ruled that this requirement extended to land use plans and is now set out in the *Conservation (Natural Habitats, &C) (Amendment) (England and Wales) Regulations 1994* (as amended 2007).

- 2.6 HRA of the policy included in the GTADPD will be carried out as the document is progressed. Final determination on whether the DPD is likely to have significant impact on the Natura 2000 sites will be included in the IIA accompanying the GTADPD Proposed Submission.
- 2.7 Natural England is the statutory authority for engagement on Habitats Regulations Assessment. Engagement on the IIA will take place from an early stage to ensure the Habitats Regulations Assessment is robust.

### **Flood Risk Sequential Test**

- 2.8 Following the cancellation of PPS25, the NPPF and PPG set out details for a sequential test approach to avoiding development in high risk flood zones. It requires that only if there are no reasonably available sites in Flood Zone 1 can development be located in Flood Zone 2 and then Flood Zone 3. Within each flood zone, new development should also be directed to sites at the lowest probability of flooding from all sources (as indicated by the Strategic Flood Risk Assessment prepared by London Borough of Newham). The primary objective of the sequential test is to direct new development towards areas with the lowest probability of flooding given the risks associated with developing on vulnerable land. The intention is not to wholly avoid development of land that is at higher risk of flooding (given Newham's high proportion of flood zone land, this would neutralise the development potential of around half the Borough) but rather for less-vulnerable land uses to be located in these problematic areas.
- 2.9 While a sequential test of the policy included in the GTADPD will be carried out as the document is progressed, as the DPD includes no site allocations it is unlikely to pose any threat in terms of flood risk. Final determination on whether the DPD is consistent with national policy will be included in the IIA report that accompanies the Proposed Submission document. The Environment Agency is the statutory authority for engagement on the sequential test.

### **Equalities Impact Assessment**

- 2.10 An Equalities Impact Assessment (EQIA) is a way of measuring the potential impact (positive or negative) that a policy, function or service may have on different 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 our policies may have on different groups.

### **Health Impact Assessment**

- 2.11 It is proposed that the IIA will consider potential health impacts of the GTADPD. Health Impact Assessment (HIA) whilst not a statutory requirement of the DPD preparation

process, is a recognised process for scoping and addressing the health impacts of plans and development proposals. The Core Strategy includes a requirement for developers to address health impacts where major schemes are proposed and it is considered integral that health impacts are considered in the plan-making process. In the Core Strategy SA, health impacts were considered through the SA framework and the EqIA. This will be reflected in the IIA; the health objective (objective seven) in the IIA framework will provide the context for HIA of policies and proposals; health will be considered through the EqIA process.

## Assessment Stages

2.12 The stages required for an effective IIA process are set out in the table below along with the associated stage of DPD / report preparation. The tasks are taken from the 2005 ODPM guidance previously referenced and are consistent with those undertaken for the Core Strategy and DSPDPD sustainability appraisals. Note that stage A is completed via this Scoping Report with tasks A1 to A5 represented in the structure of the document.

Required stages for effective IIA	Work stage / output
<p><b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <p>A1: Identifying other relevant policies, plans and programmes</p> <p>A2: Collecting baseline information</p> <p>A3: Identifying sustainability issues and problems</p> <p>A4: Developing the IIA framework</p> <p>A5: Consulting on the scope of the IIA</p>	<p>DPD Pre-production / Evidence Gathering IIA Scoping report</p>
<p><b>Stage B: Developing and refining options and assessing effects</b></p> <p>B1: Testing the DPD objectives against the SA framework</p> <p>B2: Developing the DPD options</p> <p>B3: Predicting the effects of the DPD</p> <p>B4: Evaluating the effects of the DPD</p> <p>B5: Considering the ways of mitigating adverse effects and maximising beneficial effects</p> <p>B6: Proposing measures to monitor the significant effects of implementing the DPD</p>	<p>DPD Production IIA Production</p>
<p><b>Stage C: Preparing the Sustainability Report</b></p> <p>C1: Preparing the SA Report</p>	<p>IIA Report</p>
<p><b>Stage D: Consulting on the draft SPD and SA Report</b></p>	<p>DPD / IIA Consultation</p>

D1: Public participation on the options of the DPD and the IIA report D2: Assessing significant changes D3: Making decisions and providing information	and Examination
<b>Stage E: Monitoring the significant effects of implementing the DPD</b> E1: Finalising the aims and methods for monitoring E2: Responding to adverse effects	DPD Adoption and monitoring IIA Report (Adoption)

# A1 Identifying Relevant Policies, Plans & Programmes

- 3.1 This section establishes the plans, programmes or strategies relevant to the GTADPD and the IIA process. It is important to identify this policy framework at an early stage as a wide range of guidance and initiatives influence the United Kingdom’s planning system and the development of planning policy in Newham.
- 3.2 The policy framework is constantly evolving: at a national level, the National Planning Policy Framework and Guidance are now in place (replacing and simplifying swathes of former national policy and guidance documents); at a regional level, the London Plan and associated Supplementary Planning Guidance are subject to on-going review - for example through REMA (Revised Early Minor Alterations) and the forthcoming FALP (Further Alterations to the London Plan). At a sub-regional level, planning decisions in Newham are influenced by a number of statutory plan-making authorities and policy is developed with regard to corporate Council-wide strategies. In addition the evidence base continues to evolve as Newham’s LDF is filled out. Two key strategies highlighted below are the Mayor of Newham’s Resilience Agenda and the Convergence Strategy of the ‘Growth Boroughs’ (with its stated aim that within 20 years of the 2012 Games, the host communities should have the same social and economic chances as other London boroughs).
- 3.3 Table 2 below gives an overview of the key national, regional and local policies, plans and programmes that will inform the DPD and accompanying IIA, many of those listed reference further documents of relevance, and while international directives clearly influence the planning and IIA process, nothing is included here which is already covered by national guidance. Existing components of Newham’s LDF evidence base are also listed.

Table 2: Policies, plans and strategies relevant to the GTADPD IIA
<b>National</b>
<p>The <b>National Planning Policy Framework</b> (NPPF, 2012) and <b>National Planning Practice Guidance</b> (NPPG, 2014) provide the bulk of national planning policy and guidance. Other significant documents with a nationwide scope that are or may be pertinent to this IIA process include:</p> <ul style="list-style-type: none"> <li>• Planning Policy for Traveller Sites (2015, DCLG)</li> <li>• Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007</li> <li>• The Human Rights Act 1998</li> <li>• The Town and Country Planning Act, 1990</li> <li>• Criminal Justice and Public Order Act, 1994</li> <li>• Anti-social Behaviour Act, 2003</li> <li>• Planning and Compulsory Purchase Act, 2004</li> </ul>

**Table 2: Policies, plans and strategies relevant to the GTADPD IIA**

- Housing Act, 2004
- Housing Act, 1996 (in respect of homelessness).
- Habitats Regulations, 2010
- Safer Places: The Planning System and Crime Prevention (2004, ODPM)
- Obesity & The Environment: Increasing physical activity & active travel (2013, Public Health England / LGA)
- Planning for Sustainable Waste Management (2013, DCLG)
- Local Authority Carbon Dioxide Emissions (2014, DECC)
- Thames Estuary 2100 Flood Risk Management Plan (2002, Environment Agency)
- Thames River Basin Management Plan (2009, Environment Agency)
- Groundwater Protection: Policy and Practice (2013, Environment Agency)
- London Borough Environmental Fact Sheet (2011, Environment Agency)
- Air pollution: Action in a Changing Climate (2010, DEFRA)
- Air Quality Regulations (2010)
- UK Air Quality Strategy (2007, DEFRA)
- The Setting of Heritage Assets (2011, English Heritage)
- Understanding Place: Conservation Area Designation, Appraisal & Management (2011, EH)
- Conservation Principles, Policies and Guidance (2008, English Heritage)
- Energy Efficiency and Historic Buildings (2012, English Heritage)
- National Heritage Protection Plan (2011, English Heritage)

### **Regional**

The Mayor of London via the Greater London Authority (GLA) sets out regional planning policy primarily in **The London Plan** (March 2015). Further GLA Supplementary Planning Guidance documents that may be of relevance include:

- Social Infrastructure (May 2015)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Town Centres (July 2014)
- Character and Context (June 2014)
- London Planning Statement (May 2014)
- Sustainable Design and Construction (April 2014)
- Safeguarded Wharves Review (March 2013)

**Table 2: Policies, plans and strategies relevant to the GTADPD IIA**

- Preparing Borough Tree and Woodland Strategies (February 2013)
- Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)
- Housing (November 2012)
- Land for Industry and Transport (September 2012)
- Play and Informal Recreation (September 2012)
- Olympic Legacy (July 2012)
- All London Green Grid (March 2012)
- London View Management Framework (March 2012)
- London's Foundations (March 2012)
- London World Heritage Sites (March 2012)
- Planning for Equality and Diversity in London (October 2007)
- Air Quality Strategy: Cleaning London's Air (2010, MoL)

Other GLA strategy documents that may be of relevance include:

- Better Environment, Better Health: A GLA guide for London Boroughs (2013, MoL)
- Energy Planning: Preparing energy assessments (2011, GLA)
- Draft Housing Strategy (2013, MoL)
- Health Issues in Planning - Best Practice Guidance (2007, MoL)
- Land for Industry and Transport SPG (2012, MoL)
- London Carbon Scenarios to 2026 Report (2006, London Energy Partnership)
- Climate Change Mitigation and Energy Strategy (2011, MoL)
- Cultural Metropolis: Mayor's Cultural Strategy (2010, MoL)
- Delivering London's Energy Future: Climate Change Mitigation and Energy Strategy (2011, MoL)
- Economic Development Strategy for London (2010, MoL)
- Managing Risks and Increasing Resilience: Climate Change Adaptation Strategy (2011, MoL)
- Securing London's Water Future (2011, MoL)
- London Transport Strategy (2010, MoL)
- Waste Management Strategy (2011, MoL)

Also pertinent to Newham and the five Olympic delivery boroughs is the *Convergence*

**Table 2: Policies, plans and strategies relevant to the GTADPD IIA**

*Framework and Action Plan 2011-15:*

<http://www.growthboroughs.com/s/Convergence-action-plan-2011-2015.pdf>

**Local: The Development Plan**

- Core Strategy (January 2012)
- GTA DPD (Submission Version, December 2015)
- Joint Waste DPD for East London and supporting documents (2012)
- Canning Town and Custom House SPD (2008)
- Forest Gate SPD (2010)
- SPGs (Advertisements, Shopfront Design, Altering & Extending Your Home)
- Stratford Metropolitan Masterplan (2011)
- Authority Monitoring Reports (updated via annual bulletins)
- Article 4 Direction, HMOs
- District Heat Network Local Development Order
- Local Development Scheme (last amended 2011, to be updated with DPD)
- Statement of Community Involvement (last amended 2011, to be updated with DPD)
- Unitary Development Plan (adopted 2001, policies 'saved' in 2007)
- Equalities and the LDF in Newham (February 2011)

**Local: Other Borough-wide plans & strategies**

In addition to Planning Policy, the Council produces wider corporate policies and strategies that effect planning in Newham. The Mayor's 'Resilience Agenda' is currently the key overarching expression of corporate policy and is set out at <http://www.newham.gov.uk/Pages/Services/Resilience.aspx> via the following documents:

- Building Resilience: The Evidence Base (September 2013)
- Making Resilience Happen: An Update on Delivery

Other local documents of relevance include:

- Sustainable Community Strategy for 2012-2030 (2012)
- Corporate Plan 2010-13
- Air Quality Action Plan 2003 + 2008 Progress Report
- Joint Strategic Needs Assessment 2011-12 (NHS Newham CCG)
- Second Local Implementation Plan (LIP2)

**Neighbouring Authorities**



## Table 2: Policies, plans and strategies relevant to the GTADPD IIA

The Lee Valley Regional Park Authority has plan-making responsibilities that intersect with Newham:

- Lee Valley Regional Park Plan
- Lee Valley Park Development Framework

As do the London Legacy Development Corporation :

- Local Plan <http://www.londonlegacy.co.uk/planning-policy-and-decisions/the-localplan/>

The Local Plans of all surrounding authorities should also be considered, these include:

- London Borough of Hackney
- London Borough of Redbridge
- London Borough of Barking & Dagenham
- London Borough of Greenwich
- London Borough of Waltham Forest
- London Borough of Tower Hamlets

## A2 Collecting Baseline Information

- 4.1 Task A2 establishes the baseline conditions relevant to the GTADPD and the IIA. It is important to note that since the Core Strategy was developed (and formally adopted in 2012) the creation of the London Legacy Development Corporation has removed a portion of land around Stratford from the remit of the London Borough of Newham as a Local Planning Authority. All decisions made within the LLDC area will be subject to their own Local Plan, more information can be found at: <http://queenelizabetholympicpark.co.uk/planning-authority>
- 4.2 The preparation of the GTADPD follows the development of the Core Strategy and the DSPDPD; as such, the significant data capture and analysis derived from the preparation of the Core Strategy's evidence base forms the initial baseline for the GTADPD and this IIA. This reflects the relationship that the Core Strategy (as over-arching spatial plan) and the GTADPD will have. In addition, a **Gypsy & Traveller Accommodation Assessment** (GTAA) was commissioned in 2015 with research undertaken in October / November 2015 and publication in March 2016.
- 4.3 The baseline is however constantly evolving; for example, the regeneration of Newham, changing economic conditions and improved data capture and analysis mean that the on-going analysis of statistics and information is necessary as the LDF is progressed. The Authority Monitoring Report (AMR) is updated via annual topic-based bulletins to provide the most up-to-date baseline picture of Newham. The AMR includes a broad range of economic, social and environmental data, and includes analysis, more information can be found at: <http://www.newham.gov.uk/Pages/Services/Local-plan.aspx>

Table 3: Key sources of baseline information

- Gypsy & Traveller Accommodation Assessment (March 2016)
- Core Strategy and supporting documents including Statement of Consultation (2012)
- Authority Monitoring Reports (updated via annual bulletins)
- Newham's Biodiversity Resource
- Newham Biodiversity Action Plan
- Employment Land Review
- Strategic Flood Risk Assessment
- Food Outlet Mapping in the London Borough of Newham
- Newham Strategic Housing Market Assessment
- Newham Affordable Housing Economic Viability Assessment
- Community Infrastructure Study
- Town Centre and Retail Study
- Newham Character study
- Air Quality Action Plan

Table 3: Key sources of baseline information

- Economic Development Strategy
- Housing Newham Strategy
- Joint Strategic Needs Assessment (NHS Newham and Newham Council)
- Local Implementation Plan
- Sustainable Community Strategy
- Greater London Archaeological Advisory Service (GLAAS) *London Borough of Newham - Archaeological Priority Areas Appraisal* (July 2014)

## Newham in 2016

4.4 In addition to the summary information given below, a ‘spatial portrait’ of the Borough was included in the 2012 Core Strategy, further information on Equalities groups can also be found in [Equalities and the LDF](#) (2011).

- i) Newham has historically been one of the most disadvantaged boroughs in London. Since the steady decline of the docks since the 1960s it has suffered from high unemployment and a high turnover in population, changing from a primarily white working class area in the 1980s and 1990s to the area with the highest concentration of Black and Minority Ethnic (BME) groups in the country, making up over 73% of the population in 2014 – a significant increase from 61% in 2001 (GLA 2013, Round Ethnic Group Projections). Forty-one per cent of the population over three years-old do not have English as their main language (Census, 2011). Within the population, Indian is the largest group with a 14% share, followed by Bangladeshi (13%), Black African (12%) and Pakistani (10%) (GLA 2012, Round Ethnic Group Projections).
- ii) The overall population of London grew from the 1990s, but Newham’s grew at an even faster rate than average, rising from 216,300 in 1991 to 323,400 in 2013 (GLA 2013, Demographic Projections). This growth partially helps explain why Newham has the highest average household size in London (three in 2011, compared with just over two nationally, and two and a half in London) (Census, 2011), and the steep rise in population density, from 69 in 2001 to 89 in 2011 people per hectare (GLA 2013, Demographic Projections). This is still far below the density of crowded inner boroughs like Islington, Camden or Kensington and Chelsea, or neighbouring boroughs such as Hackney or Tower Hamlets.
- iii) Newham has had historically high unemployment – more than double the national average in 1991 (Census, 1991). Thirty-one per cent of children lived in out-of-work families in 2012, compared with 19% in England (GLA 2013, Tax Credits), and the Income Support claimant rate was higher than in London or England in 2013 (GLA 2014, Income Support Claimants). Although official unemployment has fallen somewhat faster than the London and national average (from 13.1% in 2010-11% in 2013) rates of economic activity (i.e. engagement with the labour market) are still significantly below the London and

national average. Paid employment is particularly low amongst women in Newham (at 36% compared with 50% for men), with a quarter (25%) occupied by looking after their home or family (NHPS, 2014). Official unemployment has fallen similarly to London, but is still higher than the national average (GLA 2014, London Labour Market Indicators). Nearly a quarter of working age residents (23%) have not worked in the last 12 months (NHPS, 2014). The number of part-time jobs has rose from 23,000 in 2009 to 28,300 in 2012 (NOMIS). Since 2007 Workplace, Newham's job brokerage service, has helped over 20,300 residents into work. Half of the residents helped into work by Workplace are long-term unemployed (Newham Workplace, 2014).

- iv) Household incomes in Newham are significantly below the national average. The median net equivalised household income before housing costs in Newham is £15,704 (mean £20,165), compared with a national median of £22,204 (NHPS, 2014). This equates to a median income of £302 per week, which is only 71% of the national median income before housing costs of £42,793 (NHPS, 2014).
- v) Housing is a dominant problem in Newham, and across London, but the level of poverty and low income in Newham make pressures on the poorest particularly acute. The share of owner occupiers has fallen (43% in 2001; 28% in 2012) along with the share of social housing tenants (37% in 2001; 34% in 2012). But there has been a steep rise in private renting, more than doubling since 2001 from 17% to 37%. In 2012 there were 16,600 more private rented properties than in 2001, and the figure is rising. Private rents have also risen and private tenants have seen incomes after housing costs fall since 2009 (NHPS, 2014). The proportion of owner occupiers (29%) is far below the London average of 50%, and less than half the national average (64%). Meanwhile house prices, remain far below the London average (£236,000 compared with £404,000).
- vi) Newham's educational gains are the most striking achievement of the last decade. London schools have improved their GCSE attainment with five A\*-C grades including English and Maths at a faster rate than the national average. Newham has accelerated its improvements since 2008, overtook England in 2011 and 2012, is rapidly catching up with London as a whole, and does well on measures of value-added (DoE, 2014).
- vii) Newham is growing and its demographic make-up, its economy and its educational attainment are changing. It is the poorest London borough through a combination of:
  - low-paid, low-skilled work with one-fifth earning less than the minimum wage;
  - a fast growing, highly insecure and often poor quality private rented market with renters' income levels falling as a share of the national median (NHPS, 2014);
  - a high level of benefit dependency, both among those in work and those not working.

- viii) Almost two thirds of all residents (63%) receive some benefits (NHPS, 2014). The rate of child poverty in Newham is more than three times the national average (55% compared with 17%). Over half of Newham's children live in poor households with incomes below 60% of median incomes (NHPS, 2014).
- ix) Two-fifths of residents (41%) are poor, and over a quarter suffer fuel poverty (28%) (NHPS, 2014). One in eight (12%) are at least two months behind with their rent or mortgage. Only one in eight residents (11%) say they are "comfortable"; a quarter of all residents (26%) are struggling to manage financially; and a third (32%) are just "getting by".

## A3 Identifying Local Sustainability Issues

- 5.1 Task A3 identifies key sustainability issues that have been identified for Newham, which the GTADPD and the IIA should aim to address. These have been identified through monitoring, engagement with stakeholders, the development of the Local Plan evidence base and the preparation of the Core Strategy.
- 5.2 The sustainability issues are set out in the context of the five Core Strategy themes, in recognition of the over-arching status of the spatial plan and the likely format of the GTA DPD. Setting the sustainability issues out in this context will also enable the IIA to be consistent with the Sustainability Appraisal and other impact assessments prepared for the Core Strategy.
- 5.3 The GTADPD will include spatial policy (including allocation of sites) and detailed policies for the purposes of development management. As the document advances, further and more detailed sustainability issues will be identified; as such, the IIA accompanying the Issues and Options and Proposed Submission stages of the DPD will include assessment of policies that seek to address sustainability issues that may not have been identified at this stage, or emerge during the plan-making period.
- 5.4 The broad sustainability issues identified are set out in Table 4.

<b>Table 4: Sustainability issues and problems</b>	
<b>Successful Places</b>	
<p><b>Sustainability issues and problems:</b></p> <ul style="list-style-type: none"> <li>• Improving the quality of the built environment.</li> <li>• Improving the health of Newham residents by promoting healthy lifestyles.</li> <li>• Maintaining local distinctiveness and protecting and enhancing place-making assets.</li> <li>• Improving town and local centres.</li> <li>• Improving movement corridors and linear gateways.</li> </ul>	<p><b>Key sources:</b></p> <ul style="list-style-type: none"> <li>• Authority Monitoring Report Bulletins</li> <li>• Newham Character Study</li> <li>• Food Outlet Mapping in the London Borough of Newham</li> <li>• Town Centre and Retail Study</li> <li>• Core Strategy Consultation Statement</li> </ul>
<b>Jobs, business and skills</b>	
<p><b>Sustainability issues and problems:</b></p> <ul style="list-style-type: none"> <li>• Improving the borough's economy through regeneration.</li> </ul>	<p><b>Key sources:</b></p> <ul style="list-style-type: none"> <li>• Authority Monitoring Report Bulletins</li> <li>• Employment Land Review</li> </ul>

**Table 4: Sustainability issues and problems**

<ul style="list-style-type: none"> <li>• Improving land use efficiency through managed release of surplus employment land.</li> <li>• Improving the educational attainment, skills and aspirations of Newham’s residents</li> </ul>	<ul style="list-style-type: none"> <li>• Economic Development Strategy</li> <li>• Core Strategy Consultation Statement</li> </ul>
<p><b>Homes</b></p>	
<p><b>Sustainability issues and problems:</b></p> <ul style="list-style-type: none"> <li>• Providing the right mix and balance of housing types, sizes and tenures.</li> <li>• Providing affordable housing.</li> <li>• Providing accommodation for those with specialist need.</li> <li>• Improving existing housing stock.</li> </ul>	<p><b>Key sources:</b></p> <ul style="list-style-type: none"> <li>• Authority Monitoring Report Bulletins</li> <li>• Newham Strategic Housing Market Assessment</li> <li>• Newham Affordable Housing Economic Viability Assessment</li> <li>• Equalities and the LDF</li> <li>• Core Strategy Consultation Statement</li> </ul>
<p><b>Sustainability and climate change</b></p>	
<p><b>Sustainability issues and problems:</b></p> <ul style="list-style-type: none"> <li>• Mitigating and adapting to climate change.</li> <li>• Ensuring high standards of sustainable design are achieved in the built environment.</li> <li>• Improving resource efficiency in the built environment (including energy, waste, water).</li> <li>• Improving resilience to flood risk.</li> <li>• Protecting, enhancing and creating habitats for biodiversity.</li> </ul>	<p><b>Key sources:</b></p> <ul style="list-style-type: none"> <li>• Authority Monitoring Report Bulletins</li> <li>• Newham’s Biodiversity Resource: Evidence Base for the LDF</li> <li>• Newham Biodiversity Action Plan</li> <li>• Strategic Flood Risk Assessment</li> <li>• Equalities and the LDF</li> <li>• Core Strategy Consultation Statement</li> </ul>
<p><b>Infrastructure</b></p>	
<p><b>Sustainability issues and problems:</b></p> <ul style="list-style-type: none"> <li>• Improving the transport network.</li> <li>• Improving recycling and the management of waste.</li> <li>• Providing opportunities for heat and power networks.</li> </ul>	<p><b>Key sources:</b></p> <ul style="list-style-type: none"> <li>• Authority Monitoring Report Bulletins</li> <li>• Community Infrastructure Study</li> <li>• Local Implementation Plan</li> <li>• Equalities and the LDF</li> </ul>

**Table 4: Sustainability issues and problems**

<ul style="list-style-type: none"><li>• Address existing open space deficiencies and improving existing open spaces.</li><li>• Improve existing waterways and riparian environments</li><li>• Providing adequate community facilities and infrastructure.</li><li>• Promoting local access whilst managing impacts</li></ul>	<ul style="list-style-type: none"><li>• Core Strategy Consultation Statement</li></ul>
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## A4 Developing the IIA Framework

- 6.1 Task A4 sets out the IIA objectives; these have evolved through SA/SEA already undertaken for the Local Plan (specifically that undertaken for the Core Strategy) but have been updated in line with recent changes to corporate strategy and other contextual changes (such as changes in development plan terminology). The Core Strategy SA scoping report proposed 18 sustainability objectives that were refined following statutory and stakeholder engagement. This IIA scoping report consolidates and updates those objectives for the purposes of the GTADPD IIA resulting in 3 overarching, cross-cutting outcome-oriented objectives, 3 core spatial outcome objectives, and 7 more traditional ‘impact’ objectives. Inevitably however, all overlap to some extent.
- 6.2 The 13 objectives set out below reflect the move towards integration of impact assessments for the GTADPD; objectives and associated prompt questions can be linked to Habitats Regulations Assessment (objective 12), the PPS25 Sequential Test (objective 11), Equalities Impact Assessment (particularly but not exclusively objectives 1, 3, 6) and Health Impact Assessment (particularly objective 2).
- 6.3 Each of the objectives has been linked to the monitoring framework set out for the Core Strategy, which established a comprehensive set of indicators to be examined through the Authority Monitoring Report Bulletins. Making use of the same indicators for the GTADPD IIA allows for a consistency across the LDF and ensures the objectives established below can be assessed. As the GTADPD is progressed, the IIA will appraise policy options and site allocations against these objectives.
- 6.4 The framework of objectives is set out in Table 5; for the purposes of the IIA, the decisions being appraised will be in the formation of the development management policy within the GTADPD.

**OBJECTIVES** (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)

<p><b>1. To reduce poverty and promote equality of opportunity</b></p>	<p><b>J-OUT2</b></p>
<p>a) Will it reduce poverty in those areas and communities / equalities groups most affected (social and spatial convergence)?</p> <p>c) Will it improve access to low-cost transport and other facilities?</p> <p>d) Will it help tackle fuel poverty?</p> <p>e) Will it provide good quality education facilities, including life-long learning for all?</p> <p>f) Will it help promote access to employment opportunities for all local people?</p> <p>g) Will it promote economic, personal and community resilience (as per Newham’s Resilience Agenda)?</p> <p>h) Will it increase the numbers of higher paid jobs in the borough?</p> <p>i) Will it help to provide employment in the most deprived areas and stimulate regeneration?</p> <p>j) Will it help reduce overall unemployment, particularly long-term unemployment?</p> <p>k) Will it support healthier lifestyles for all?</p> <p>l) Will it provide for successful neighbourhoods for all?</p>	<p>i) Jobs, employment and activity Rates</p> <p>ii) Low earnings and deprivation (proxy)</p> <p>iii) Proportion of working age population qualified to level 2 or more</p>
<p><b>2. To support healthier lifestyles</b></p>	<p><b>SP-OP2</b></p>
<p>a) Will it facilitate an increase in physical activity including sports and active travel?</p> <p>b) Will it increase [relative] access to healthy food ?</p> <p>c) Will it improve the quality of housing for all?</p> <p>d) Will it improve access to jobs for all and otherwise reduce poverty?</p> <p>e) Will it improve access to high quality health facilities and encourage provision in areas of need?</p> <p>f) Will it help improve mental and emotional health, reducing social exclusion?</p> <p>g) Will it help to reduce the number of people dying prematurely from preventable causes?</p> <p>h) Will it reduce exposure to poor air quality across all groups?</p>	<p>i) No of new takeaways permitted</p> <p>ii) Controlling environmental nuisance and health impacts</p> <p><b>SP-OUT2</b></p> <p>i) Mortality rate</p> <p>ii) Rates of physical activity, childhood obesity and mortality linked to circulatory diseases</p> <p>Plus relevant transport, open space etc indicators</p>
<p><b>3. To create successful neighbourhoods</b></p>	

**OBJECTIVES** (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)

- a) Will it help to make people feel positive about the area they live in?
- b) Will it help reduce the number of vacant and derelict buildings?
- c) Will it help reduce disturbance from noise?
- d) Will it improve safety and security, and reduce crime, fear of crime and anti-social behaviour?
- e) Will it provide for a well maintained and inclusive public realm and other public facilities?
- f) Will it encourage an active and connected, strong and cohesive community (personal and community resilience)?
- g) Will it provide for access to the mix of housing, jobs and infrastructure people that meets local needs and provides for quality of life?

**SP-OUT1**

- i) Crime and fear of crime
- ii) Environmental nuisance levels

**S-OUT1**

- i) Levels of out-migration to other UK authorities
- ii) Satisfaction with the area

**4. To ensure people have access to a choice of good quality, well located housing that meets their needs**

- a) Will it increase the supply of housing?
- b) Will it help people on moderate and lower incomes house themselves?
- c) Will it enable families to house themselves?
- d) Will it allow residents with specific needs to house themselves appropriately?
- e) Will it encourage development of an appropriate density, standard, size and mix?
- f) Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle, taking into consideration exposure to potential environmental hazards?
- g) Will it improve overall design quality, including flexibility of stock to enable it to evolve to meet changing needs?

**H-OUT1**

- a) Homeless Households in temporary accommodation
- b) Number of Households on the Local Authority waiting list

**H-OUT2**

Housing quality (stock condition)

**H-OUT3**

Housing affordability

**5. To foster sustainable economic growth**

**J-OUT1**

**OBJECTIVES** (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)

- a) Will it encourage business start-ups and support the growth and continuing health of successful businesses, town and local centres in the area?
- d) Will it help to diversify the economy?
- e) Will it focus growth in locations with appropriate access and other facilities?
- g) Will it develop the workforce skills necessary to support and grow Newham's economy?
- e) Will it support the development of green industries?
- e) Will it encourage the transportation of freight by means other than road?

- i) Businesses by sector
- ii) New business formation and Survival
  - a) Rate of Business Formation per 10,000
  - b) 3 year business survival rate
- iii) Vacancy rates on Employment Land

**J-OUT2**

- i) Jobs, employment and activity Rates
- ii) Low earnings and deprivation (proxy)
- iii) Proportion of working age population qualified to level 2 or more

**SP-OUT4**

- i) Vacancy Levels and non-retail uses in primary frontages in town centres

**6. To ensure inclusive access to a range of high-quality community facilities and open space**

**INF-OUT5**

- i) Distribution of key

**OBJECTIVES** (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)

- a) Will it enable improved, inclusive access to a range of community facilities and open space?
- b) Will it enable deficiencies of access to community facilities and open space to be positively addressed?
- c) Will it improve the quality of community facilities and open space?
- d) Will it improve visibility of community facilities and perceived openness to all?
- e) Will it improve access to low-cost transport and other facilities, including those in other boroughs where appropriate?
- f) Will it help to sustain the provision of community facilities and open space that meets local needs?

- community facilities in the borough
- ii) Other data concerning infrastructure sufficiency (e.g. childcare sufficiency assessment)

**INF-OP8**

- i) Net new community infrastructure floorspace in new and established neighbourhoods
- ii) Provision of multi-purpose community facilities

**INF-OUT4**

- ii) Satisfaction with Parks (proxy)

**INF-OP6/7**

- i) Open space losses and gains
- ii) Open space improvements
- iii) Blue ribbon improvements - to access etc

**7. To promote resource-efficient development, design and construction**

- a) Will it encourage the generation and use of renewable energy?
- b) Will it encourage energy efficiency?
- c) Will it reduce CO2 and other greenhouse gas emissions?
- d) Will it encourage the re-use of resources?
- e) Will it encourage sustainable construction methods and procurement?
- f) Will it encourage water efficiency and drought resilience?
- g) Will it help avoid overheating in the built environment?
- h) Will it encourage the reuse or improvement of buildings and land that are vacant, under utilised or in disrepair?
- c) Will it make the best use of scarce land resources?

**SC-OP1/2:**

BREAAM and Code for Sustainable Homes Scores of major consents

**SC-OUT1**

- i) Water consumption per capita
- ii) CO2 emissions (proxy for energy)
- iii) Environmental performance of housing stock

**H-OP1**

- ii) Housing density

**J-OUT1**

- iii) Vacancy rates on Employment Land

See also waste indicators

**OBJECTIVES** (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)

<p><b>8. To improve air and water quality</b></p> <p>a) Will it improve air quality?  b) Will it reduce emissions of greenhouse gases?  c) Will it help to reduce emissions of PM10 and NO2?  d) Will it reduce traffic volume and congestion?  e) Will it improve the quality of waterbodies?  f) Will it reduce discharges to surface and ground waters?  g) Will it improve the water systems infrastructure (e.g. water supply and sewerage)?</p>	<p><b>SC-OUT2</b>  ii) River water quality</p> <p><b>SP-OUT2</b>  iii) Air Quality Exceedences</p>
<p><b>9. To increase the proportion of journeys made by sustainable modes of transport</b></p> <p>a) Will it encourage development at locations that enable walking, cycling and/or the use of public transport?  b) Will it encourage the provision of infrastructure for walking, cycling and/or public transport?  c) Will it encourage access for all to public transport?  e) Will it make journeys by sustainable modes of transport easier, safer and more pleasant?</p>	<p><b>INF-OUT1</b>  i) Modal shift  a) Walking mode share  b) Cycling mode share cycling trips originating in borough  ii) Traffic volume and congestion (proxy)</p> <p><b>INF-OUT2</b>  ii) Transport related CO2 emissions</p>
<p><b>10. To reduce the amount of waste requiring final disposal whilst promoting the proximity principle</b></p> <p>a) Does it encourage the reduction, reuse, and recycling of waste (in that order of priority)?  b) Does it provide for the future demand for waste management infrastructure in-line with the above hierarchy and proximity principle?</p>	<p><b>INF-OUT3</b>  i) Proportion of waste dealt with within the borough/ELWA area  ii) Waste arising by management type</p> <p>Plus relevant resource-efficiency indicators</p>
<p><b>11. To minimise and reduce flood risk</b></p> <p>a) Will it promote the use of sustainable urban drainage systems?  b) Does it take into account potential flood risk, minimising the risk of harm to people and property?</p>	<p>Currently no relevant outcome indicators - though should include flood incidents (to be developed)</p> <p>Proxy output indicators however are:  SC-OP3  i) Planning permissions granted contrary to EA advice  ii) Flood protection projects delivered as part of consents and otherwise</p>

<b>OBJECTIVES</b> (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)	
<b>12. To enhance and protect existing habitats and biodiversity</b>	
a) Will it protect and enhance natural habitats in the borough, particularly those of priority species (includes terrestrial and aquatic)? b) Will it provide for the protection of biodiversity in the borough? c) Will it encourage the creation of new habitats, including through the provision of additional open space and green roofs? d) Will it improve soil quality?	<b>SC-OP4</b> ii) Changes in areas of biodiversity importance  Plus more periodic species monitoring
<b>13. To enhance character, protecting, conserving and enhancing heritage and other character assets</b>	
Will it protect and enhance sites, features and areas of historical value? Will it conserve and enhance the townscape/cityscape character? • Will it promote high quality design and sustainable construction methods? • Will it respect visual amenity and the spatial diversity of communities? • Will it enhance the quality of the public realm? • Will it improve the wider built environment and sense of place? Will it enable enhancement of the public realm and local distinctiveness?	<b>SP-OP3</b> (ii) Building for Life 12 Assessments of schemes  <b>SP-OP5</b> iii) Protected trees lost  <b>SP-OUT3</b> Historic buildings and monuments at risk

### Compatibility of IIA objectives

6.5 The compatibility of the IIA objectives has been assessed to identify where potential conflicts may arise. Most of the objectives have a positive or neutral effect when tested against the other IIA objectives. The neutral outcomes occurred where there was no link between the two objectives or where both positive and neutral effects were possible. Some natural conflicts also emerged where two objectives were shown to be not compatible with each other. These generally occur where an objective that requires development (such as housing or employment provision) is tested against environmental objectives (such as biodiversity). Achieving sustainable development is inevitably a balancing act.

6.6 The compatibility of the IIA objectives is shown in Table 6.

Table 6: Compatibility of the IIA objectives

Key												
✓	Objectives are compatible											
X	Objectives are not compatible											
(blank)	Objectives have neutral compatibility											
2	✓											
3	✓	✓										
4	✓	✓	✓									
5	✓	✓										
6	✓	✓	✓	✓	X							
7	✓	✓			✓							
8		✓	✓	✓	✓		✓					
9	✓	✓	✓	✓	✓	✓	✓	✓				
10					X		✓					
11		✓		X		✓	✓					
12		✓	X	X	X	X		✓		✓	✓	
13			✓								✓	
	1	2	3	4	5	6	7	8	9	10	11	12



## A5 Consulting on the Scope of the IIA

- 7.1 Task A5 requires consultation on the scope of the IIA. The Environmental Assessment of Plans and Programmes Regulations 2004 require that English Heritage, the Environment Agency and Natural England be consulted for a period of five weeks.
- 7.2 The consultation will run from Thursday 3<sup>rd</sup> March 2016 to Monday 11<sup>th</sup> April 2016. This Scoping Report and other associated documents will be available on the Council's website at: [www.newham.gov.uk/planningconsultations](http://www.newham.gov.uk/planningconsultations) - respondents are asked to comment via email to [ldf@newham.gov.uk](mailto:ldf@newham.gov.uk)
- 7.3 Responses to the Scoping Report consultation will be set out in subsequent drafts of the IIA Report. Where appropriate, soundness responses received from statutory consultation bodies and other respondents will be incorporated into the final IIA and GTADPD as far as practicable.

## Appendix 1 Quality Assurance Checklist

To ensure that the requirements of Strategic Environmental Assessments (as required by European Directive EC/2001/42) are adhered to, the following quality assurance checklist (Table 7) has been completed. It identifies where in the IIA process the requirements of SEA will be undertaken. The checklist appears in the Practical Guide to the Strategic Environmental Assessment Directive (September 2005, ODPM) and has been adapted for the purposes of this IIA.

Table 7: Quality assurance checklist	
Objectives and context	IIA reference
The plan's or programme's purpose and objectives are made clear	Expected in Issues and Options and Proposed Submission IIAs
Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets	Task A1 of this Scoping Report
SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate	Task A4 of this Scoping Report
Links with other related plans, programmes and policies are identified and explained	Task A1 of this Scoping Report
Conflicts that exist between SEA objectives, between SEA and the plan objectives and between SEA objectives and other plan objectives are identified and described	Task A4 of this Scoping Report and expected in Issues and Options and Proposed Submission IIAs
Scoping	IIA reference
Consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report	Task A5 of this Scoping Report
The assessment focuses on significant issues	Task A3 of this Scoping Report
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit	Expected in Issues and Options and Proposed Submission IIAs if appropriate

Table 7: Quality assurance checklist

Reasons are given for eliminating issues arising from further consideration	Expected in Issues and Options and Proposed Submission IIAs if appropriate
<b>Alternatives</b>	<b>IIA reference</b>
Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	Expected in Issues and Options and Proposed Submission IIAs
Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant	Expected in Issues and Options and Proposed Submission IIAs
The sustainability effects (both adverse and beneficial) of each alternative are identified and compared	Expected in Issues and Options and Proposed Submission IIAs
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.	Expected in Issues and Options and Proposed Submission IIAs if appropriate
Reasons are given for selection or elimination of alternatives.	Expected in Issues and Options and Proposed Submission IIAs if appropriate
<b>Baseline information</b>	<b>IIA reference</b>
Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	Task A2 of this Scoping Report
Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.	Task A2 of this Scoping Report
Difficulties such as deficiencies in information or methods are explained.	Task A2 of this Scoping Report
<b>Prediction and evaluation of likely significant environmental effects</b>	<b>IIA reference</b>

Table 7: Quality assurance checklist

Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.	Expected in Issues and Options and Proposed Submission IIAs
Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.	Expected in Issues and Options and Proposed Submission IIAs
Likely secondary, cumulative and synergistic effects are identified where practicable.	Expected in Issues and Options and Proposed Submission IIAs
Inter-relationships between effects are considered where practicable.	Expected in Issues and Options and Proposed Submission IIAs
Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.	Expected in Issues and Options and Proposed Submission IIAs
Methods used to evaluate the effects are described.	Expected in Issues and Options and Proposed Submission IIAs
<b>Mitigation measures</b>	<b>IIA reference</b>
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.	Expected in Issues and Options and Proposed Submission IIAs
Issues to be taken into account in project consents are identified.	Not required
<b>The Environment Report</b>	<b>IIA reference</b>
Is clear and concise in its layout and presentation.	All stages of the IIA
Uses simple, clear language and avoids or explains technical terms.	All stages of the IIA
Uses maps and other illustrations where appropriate.	Expected in Issues and Options and Proposed Submission IIAs if appropriate
Explains the methodology used.	All stages of the IIA

Table 7: Quality assurance checklist

Explains who was consulted and what methods of consultation were used.	All stages of the IIA
Identifies sources of information, including expert judgement and matters of opinion.	All stages of the IIA
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main issues considered, and any changes to the plan resulting from the SEA.	All stages of the IIA
<b>Consultation</b>	<b>IIA reference</b>
The SA is consulted on as an integral part of the plan-making process.	All stages of the IIA
The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.	All stages of the IIA
<b>Decision-making and information on the decision</b>	<b>IIA reference</b>
The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.	All stages of the IIA
An explanation is given of how they have been taken into account.	Expected in Issues and Options and Proposed Submission IIAs
Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.	Expected in Proposed Submission IIA
<b>Monitoring measures</b>	<b>IIA reference</b>
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	Expected in Proposed Submission IIA
Monitoring is used, where appropriate, during implementation of the plan to make good deficiencies in baseline information in the SEA.	To be reported in AMR if appropriate
Monitoring enables unforeseen adverse effects to be identified at an early stage (These effects may include predictions which prove to be incorrect.)	To be reported in AMR if appropriate

Table 7: Quality assurance checklist

Proposals are made for action in response to significant adverse effects.

To be reported in AMR if appropriate



The Policy Team  
Strategic Regeneration, Planning and Olympic Legacy  
London Borough of Newham

Our ref: PL00020511

BY E-MAIL:

[LocalDevelopment.Framework@newham.gov.uk](mailto:LocalDevelopment.Framework@newham.gov.uk)

31<sup>st</sup> May 2016

Dear Sir/Madam

### Local Plan: Gypsy and Traveller Accommodation DPD Issues and Options and Gypsy and Traveller Accommodation DPD Integrated Impact Assessment – March/April 2016

Thank you for consulting Historic England on the Gypsy and Traveller Accommodation DPD Issues and Options (GTADPD) and associated Integrated Impact Assessment (IIA). As the Government's statutory adviser on the historic environment, and a statutory consultee for the Strategic Environmental Assessment process, Historic England is pleased to engage in the consultation process.

We have reviewed the methodology for the study in light of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Our comments are set out below.

When considering the three areas in which additional planning policy may usefully address the issues identified in the GTADPD Issues and Options, we are pleased to note that the historic environment figures among the considerations included in the IIA. As a general comment, it is important that the place of the historic environment is understood in the final policy document as very clearly within the environmental dimension of sustainable development, in accordance with para 7 of the NPPF. At present references to the historic environment have been conflated within the IIA with references to 'character', which while relevant, only cover some elements of how the historic environment is understood and managed.

With particular regard to options 1 and 3 where you make reference to site allocations, we would draw your attention to our publication *The Historic Environment and Site Allocations in Local Plans - Historic England Advice Note 3 (HEA3)*, which offers advice to help ensure that the historic environment plays a positive role in allocating sites for development. A copy of HEA3 can be found below:

<http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>.



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Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



Historic England

In relation to the IIA, you should note that several of the documents that were produced by English Heritage that you refer to on p.9 (table 2: Policies, plans and strategies relevant to the GTADPD IIA) which have been replaced by more up to date editions. These are:

- The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning: 3 (March 2015) (<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>);
- Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016) (<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>).

The NHPP has been superseded by Heritage 2020, although this may be of lesser importance in the context of the current consultation. However, since a key outcome indicator for objective 13 in table 5 (p.26) relates to historic buildings and monuments 'At Risk', you may also wish to add the Historic England Heritage At Risk Register (London) 2015 to the list of relevant policies, plans and strategies on p.9. (<https://content.historicengland.org.uk/images-books/publications/har-2015-registers/lo-har-register2015.pdf/>) This register contains a list of all the heritage assets that are 'At Risk' in Newham, and is updated annually.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Yours faithfully

**David English**

Historic Places Adviser

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## APPENDIX 3 - SCOPING RESPONSES

**From:** Sanghera, Satbinder - Director of Partnerships and Governance  
<Satbinder.Sanghera@newhamccg.nhs.uk>  
**Sent:** 19 April 2016 14:08  
**To:** Sophie Donaldson  
**Cc:** Elizabeth Botfield  
**Subject:** FW: Consultation - IIA Scoping Report

Hi , apologies for not getting back to you sooner. I have read the document and I think it covers equality impact (p20) and there are couple of areas that link directly to health and access to health for all.

The only thing I think the document does not mention is how it will address the needs of those who may be vulnerable e.g. disabled people amongst this community. I think it should make a mention of that because of the evidence of serious health inequalities amongst disabled people- if they are gypsy and travellers then they may be more disadvantaged. So the document needs to highlight the issue and make recommendation about mitigating actions.

Regards

**Satbinder Sanghera**  
**Director of Partnerships and Governance**  
**Newham CCG**  
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**Please note, NHS Newham CCG is moving offices at the end of November. Our new home will be [4th Floor Unex Tower, 5 Station Street, London E15 1DA](#)**



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Ms Elizabeth Botfield  
London Borough of Newham

[ldf@newham.gov.uk](mailto:ldf@newham.gov.uk)

**Our ref:** NE/2006/000060/OT-05/PO1-L01

**Date:** 29 March 2016

Dear Ms Botfield

### **Integrated Impact Assessment Scoping Report for a proposed Gypsy and Traveller Accommodation DPD**

Thank you for consulting us on the above document.

We appreciate that it is not always feasible to include details of individual sites at this stage but it is important that the matters of flood risk, biodiversity and the water environment are considered as the document progresses.

Large areas of the borough are within areas at risk of flooding. We are pleased to see that the Scoping Report has acknowledged the requirement for a Sequential Test to be undertaken through the development of the DPD as sites are proposed.

The Sequential Test should be carried out in line with the National Planning Practice Guidance (NPPG): [Flood Risk and Coastal Change](#) (section 25). For the site to pass the Sequential Test it must be satisfactorily demonstrated to the local planning authority (LPA) that there are no alternative sites available for this development at a lower risk of flooding. The proposed development should also be compatible with [Table 3](#) of the NPPG.

Any sites adjacent to a main river should be considered in line with the Water Framework Directive (WFD) and the River Basin Management Plan (RBMP). It will need to be demonstrated that biodiversity and habitat along the river corridor will be protected and, where possible, enhanced. Development of a site should not prevent future improvement works to the river or its banks or cause deterioration in the water quality.

#### **Water Quality**

The Planning Practice Guidance: [Water supply, wastewater and water quality](#) (paragraph 16) explains why water quality should be a significant planning concern when a proposal has the potential to indirectly affect water bodies (including groundwater), for example;

- As a result of new development such as the redevelopment of land that may be affected by contamination, mineral workings, water or wastewater treatment, waste management facilities and transport schemes including culverts and bridges;
- Through a lack of adequate infrastructure to deal with wastewater.

The installation of private sewage treatment facilities within publicly sewered areas is not normally considered environmentally acceptable because of the greater risk of failures leading to pollution of the water environment compared to public sewerage systems.

Where it is likely a proposal would have a significant adverse impact on water quality a detailed assessment will be required. The assessment should form part of the [environmental statement](#).

When a detailed assessment is needed, the components are likely to include:

- The likely impacts of the proposal (including physical modifications) on water quantity

Cont/d..



and flow, river continuity and groundwater connectivity, and biological elements (flora and fauna).

- How the proposed development will affect measures in the river basin management plan to achieve [good status](#) in water bodies.
- How it is intended the development will comply with other relevant regulatory requirements relating to the water environment (such as those relating to bathing waters, shellfish waters, freshwater fish and drinking water) bearing in mind compliance will be secured through the Environment Agency's permitting responsibilities.

The Planning Practice Guidance: Water supply, wastewater and water quality [Paragraph 18](#) states;

In the few cases where a detailed assessment indicates that development will have a significant adverse impact on water quality then the proposed development will only be acceptable in terms of the [Water Framework Directive](#) in the circumstances set out in the river basin management plan.

There is a [general duty on all public bodies](#) to provide information and such assistance as the Environment Agency may reasonably seek in connection with exercising their responsibilities for implementing the Water Framework Directive. Where this has been requested by the Environment Agency, the local planning authority should notify the Environment Agency if planning permission is granted for a new development likely to lead to a deterioration of a water body.

**Table 2:**

Please note that the *Thames River Basin Management Plan (2009, Environment Agency)* has been superseded. The updated RBMP was published in February 2016 on the [gov.uk](#) website and sets out the progress made since the 2009 plan, the current state of the water environment and the programme of actions and measures to improve the water environment.

**Flood Defence Consent**

Currently, under the terms of the Water Resources Act 1991, and the Thames Land Drainage Byelaws 1981, the prior consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of a 'main river' (16m metres for tidal watercourses). Please note that from 6 April 2016, this consenting process will move into the Environmental Permitting Regulations and become Flood Risk Activity Permits.

If you have any questions please contact me on 0203 025 5486 or email me at [northlondonplanning@environment-agency.gov.uk](mailto:northlondonplanning@environment-agency.gov.uk), quoting the reference at the beginning of this letter.

Yours sincerely

**Mr Andy Goymer**  
**Planning Advisor**

Telephone: 0203 025 5486  
E-mail: [northlondonplanning@environment-agency.gov.uk](mailto:northlondonplanning@environment-agency.gov.uk)  
Address: Environment Agency, Ergon House, Horseferry Road, London SW1P 2AL

Date: 08 April 2016  
Our ref: 180459  
Your ref: IIA Scoping Report GTADPD



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**BY EMAIL ONLY**

Dear Sir/Madam,

**Planning consultation:** Integrated Impact Assessment Scoping Report - Gypsy and Traveller Accommodation DPD - London Borough of Newham

Thank you for your consultation on the above dated and received by Natural England on 03 March 2016.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have considered the contents of the Scoping Report for the Integrated Impact Assessment of the proposed Gypsy and Traveller Accommodation DPD for Newham and have the following comments to make:

The approach and methodology used are in line with the advice that would be offered by Natural England and the issues covered are those that we would expect to see in such a document.

We advise that at Table 2: Policies, plans and strategies relevant to the GTADPD IIA, the national legislation should also include the Wildlife and Countryside Act and the Natural Environment and Rural Communities (NERC) Act.

It would be helpful if section 4.4 also included a spatial portrait of the environmental condition of the Borough. The current portrait is focussed on social and economic aspects, some information on the environment such as greenspace provision and the number of wildlife sites etc, should also be covered.

Thirteen objectives are listed which can be broadly supported, especially the following objectives:

2. To support healthier lifestyles
6. To ensure inclusive access to a range of high-quality community facilities and open space
8. To improve air and water quality
9. To increase the proportion of journeys made by sustainable modes of transport
11. To minimise and reduce flood risk
12. To enhance and protect existing habitats and biodiversity
13. To enhance character, protecting, conserving and enhancing heritage and other character assets.



Green Infrastructure (GI) should also be included as an objective, or could be incorporated in objective 6. GI is a strategically planned and delivered network of high quality green spaces and other environmental features. It should be designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits for local communities. Green Infrastructure includes parks, open spaces, playing fields, woodlands, allotments and private gardens.

Green Infrastructure should be provided as an integral part of all new development, alongside other infrastructure such as utilities and transport networks.

The following link provides access to guidance for local planning authorities on Green Infrastructure: <http://publications.naturalengland.org.uk/publication/35033?category=49002>

We note in section 6.5 and 6.6 the compatibility of IIA objectives and that objectives 3,4, 5 and 6 are marked as not compatible with objective 12 for biodiversity. Natural England views development as an opportunity to deliver environmental improvements and housing or employment proposals could still incorporate features which are beneficial to the environment. This could include [green roofs](#), as mentioned in question c, objective 12, roosting opportunities for bats or the installation of bird nest boxes. Objective 6 has been marked as not compatible, however open spaces is ideal in creating suitable places for both people and wildlife through green infrastructure provision, planting native species and creating habitats.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Kayleigh Cheese on 02080 260981. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully

Miss Kayleigh Cheese  
Northamptonshire Sustainable Development Team