



London Borough of Newham Council

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# Newham Local Plan (Regulation 18) – Integrated Impact Assessment (Final Report)





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## Report for

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## Document revisions

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1	Draft for client	09/11/22
2	Draft for Cabinet	22/11/22
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# Non-Technical Summary

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## Introduction

This document is the Non-Technical Summary (NTS) of the Integrated Impact Assessment (IIA) of the Regulation 18 version of the London Borough of Newham's Local Plan refresh (the draft Local Plan). It provides an overview of the IIA process and describes the key sustainability effects anticipated as a result of the implementation of the development options and policies contained in the draft Local Plan. The main IIA report includes the following:

- **Section 1:** Introduction - Includes a summary of the draft Local Plan consultation document, an overview of IIA, report contents and an outline of how to respond to the consultation;
- **Section 2:** Review of Plans and Programmes - Provides an overview of the review of those plans and programmes relevant to the Local Plan and IIA that is contained at **Appendix C**;
- **Section 3:** Baseline Analysis - Presents an overview of the Borough, updates to the baseline and the key sustainability issues that have informed the IIA Framework and appraisal;
- **Section 4:** Approach to the IIA - Outlines the approach to the IIA of the draft Local Plan including the IIA Framework, which is presented in **Appendix D**;
- **Section 5:** Appraisal of Effects – Presents the findings of the IIA of the draft Local Plan and options, with more detailed information presented in **Appendix E to H**; and
- **Section 6:** Conclusions and Next Steps – Presents the conclusions of the IIA of the draft Local Plan and details the next steps in the appraisal process.

## The Local Plan Refresh

The London Borough of Newham's Local Plan currently comprises the Local Plan (2018), Gypsy and Traveller Accommodation Development Planning Document (DPD) (2017) and the Joint Waste Plan (2012). London Borough of Newham Council (the Council) has commenced a refresh of the Local Plan – in response to updated Newham objectives and strategies; changes in the development context and market trends; and updated national and regional planning requirements. This will result in an updated Local Plan incorporating policy for Gypsy and Traveller accommodation covering the period 2023-2038.

## Integrated Impact Assessment

This IIA incorporates:

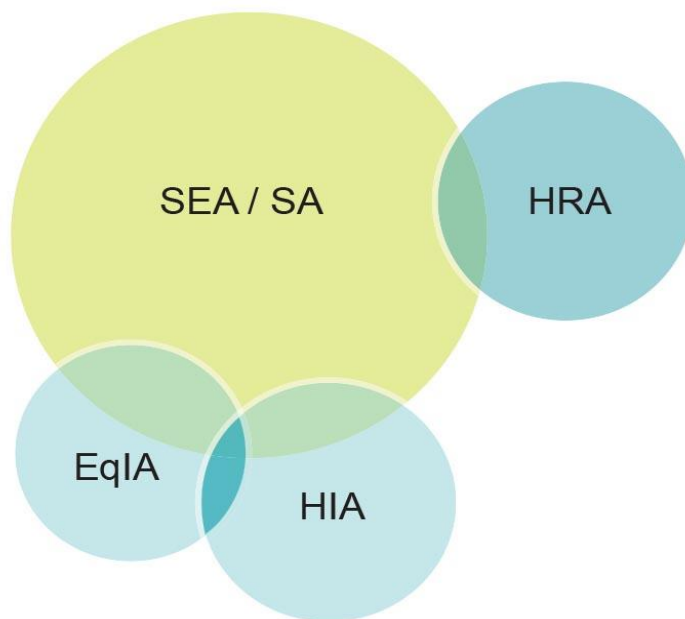
- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) – that consider the potential for significant economic, social and environmental effects;
- Health Impact Assessment (HIA), which focusses on health and well-being and how the Draft Local Plan contributes to these;
- Equalities Impact Assessment (EqIA), which helps the Council to consider its duties under the Equality Act 2010 and Public Sector Equality Duty, which requires public

bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities; and

- Habitats Regulations Assessment (HRA)- Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') requires that competent authorities (including the Borough Council) assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any 'likely significant effects' (LSE) on any European site.

There is some overlap between the different forms of assessment that make up the IIA and this is shown in **Figure NTS.1** below.

**Figure 1.1 Overlaps between the different forms of assessment**



## How has the draft Local Plan been assessed?

The Council consulted on a non-statutory Issues and Options Consultation Paper between October and December 2021. Concurrently, the Council also published the IIA Scoping Report for consultation. This included the contextual information used to inform the scope of the IIA, along with a draft IIA Framework to be used to complete the assessment. The information in the Scoping Report that has been revised to reflect the latest available baseline information and the consultation responses received on the Scoping Report. It is included in the IIA Report and has been used to inform the assessments.

The IIA Framework contains a series of objectives and supporting criteria that reflect both the current socio-economic and environmental issues which may affect (or be affected by) the Local Plan and the objectives contained within other plans and programmes reviewed for their relevance to the IIA and Local Plan. The objectives are set out in **Table NTS.1** below, along with the abbreviation for each objective used in this report.



**Table NTS.1 SA Objectives**

<b>Sustainability Objective</b>	<b>Short hand</b>
<b>SO1: Promote diverse and economically thriving town centres.</b>	SO1: Town Centres
<b>SO2: Ensure that neighbourhoods are liveable, safe, high quality with good accessibility to retail, leisure, culture, healthcare, education and open space.</b>	SO2: Neighbourhoods
<b>SO3: Maintain local distinctiveness and protect and enhance place-making assets.</b>	SO3: Place-making
<b>SO4: Encourage growth of local businesses, attract inward investment and increase employment</b>	SO4: Employment
<b>SO5: Ensure that economic benefits are retained within the borough following Community Wealth Building principles</b>	SO5: Economic benefits
<b>SO6: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.</b>	SO6: Education
<b>SO7: Improve the existing housing stock in the borough</b>	SO7: Housing stock
<b>SO8: Increase the supply of housing, choice and quality of affordable housing in the borough</b>	SO8: Housing supply
<b>SO9: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.</b>	SO9: Climate change
<b>SO10: Ensuring high standards of sustainable design are achieved in the built environment.</b>	SO10: Sustainable design
<b>SO11: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.</b>	SO11: Natural resources
<b>SO12: Avoid, reduce and manage all forms of flood risk</b>	SO12: Flood risk
<b>SO13; Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.</b>	SO13: Land quality
<b>SO14: Address existing open space deficiencies and improving existing green &amp; blue infrastructure and open spaces.</b>	SO14; GBI
<b>SO15: Protect, enhance and increase biodiversity, habitats and species in the borough</b>	SO15: Biodiversity
<b>SO16: Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road.</b>	SO16: Sustainable transport
<b>SO17: Reduce amount of waste sent to landfill and increase reuse, recycling, and recovery.</b>	SO17: Waste
<b>SO18: Provide quality community facilities and infrastructure in the right location for residents.</b>	SO18: Community facilities

Sustainability Objective	Short hand
<b>SO19: Encourage greater community cohesion and reduce poverty, Racism, Inequality and Disproportionality.</b>	SO19: Inclusion
<b>SO20: Improve and increase the facilities and opportunities for young people.</b>	SO20: Young people
<b>SO21: Contribute towards reducing crime and the fear of crime.</b>	SO21: Crime
<b>SO22: Improve the health and wellbeing of the population and reduce health inequalities.</b>	SO22: Health and wellbeing

This report considers policies and proposed allocations in the draft Local Plan and any reasonable alternatives across the following topics:

- Vision and objectives;
- Spatial strategy;
- The role of neighbourhoods;
- Quantum of Employment Land for Industrial Uses;
- Thematic policies, including consideration of reasonable alternatives; and
- Site allocations, including consideration of reasonable alternatives.

**Table NTS.2** shows the scoring system used to assess the above elements and any reasonable alternatives.

### Table NTS.2 Scoring System

Significance of effect		Description of effect
++	Significant positive	Likely to benefit a large area of the borough and wider area, or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major.
+	Minor positive	The extent of predicted beneficial effects is likely to be limited to small areas within the borough or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor.
0	Neutral	Neutral effects are predicted where the option being assessed is unlikely to alter the present or future baseline situation.
-	Minor negative	Minor negative effects are likely to be limited to small areas within the borough or limited to small groups of people and receptors and or those with low sensitivity to change. The effects can be direct or indirect, temporary or reversible. The importance of the receptor that is affected is likely to be minor, as is the magnitude of the predicted effect.

Significance of effect		Description of effect
--	Significant negative	Likely to affect the whole, or large areas of the borough and the wider area. Also applies to effects on nationally or internationally important assets. The effects are likely to be direct, irreversible and permanent and or those with high sensitivity to change. The magnitude of the predicted effects will also be major.
+/-	Mixed Score	This could be any combination of minor or significant positive or negative effects or an indication that there is uncertainty.
?	Unknown	This significance criterion is applied to effects where there is insufficient information to make a robust assessment. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other.
~	No relationship	This is applied to objectives that are clearly not affected by the option or policy being assessed.

## Key Findings and Recommendations from the Assessment

### Spatial Strategy

The council identified four options relating to the spatial strategy and these are summarised in **Table NTS.3** below.

**Table NTS.3 Reasonable Alternatives for the Spatial Strategy**

Option	Description	Reason for consideration
1	Directing significant levels of growth to neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area, neighbourhoods along the River Lea which form part of the cross boundary Poplar Riverside Opportunity Area and to the Stratford and Maryland neighbourhood, supported by a redesigned Stratford Station, with incremental character-led intensification and change in other neighbourhoods. All 16 neighbourhoods to experience some degree of change, influenced by individual policies informed by the specific needs of that neighbourhood.	Consistent with the London Plan 2021 and 15 minute neighbourhood principle.
2	Retain the Arc of Opportunity and Urban Newham. Arc of Opportunity is focus of job creation, infrastructure development, new town and local centres and vast majority of new housing. In Urban Newham there is incremental and small change focussed in town and local centres and Crossrail centres, based on 6 neighbourhoods.	This is the approach set out in the Adopted Local Plan.

Option	Description	Reason for consideration
3	Direct significant levels of growth at high density to all neighbourhoods.	Logical alternative to consider impact of delivering high levels of growth across the borough
4	Direct significant levels of growth to Stratford as Metropolitan Centre and to Opportunity Areas only.	Focuses development in key areas in the borough as outlined in the London Plan 2021.

Each option has been appraised against the IIA objectives and in accordance with the approach detailed in **Section 4.3** of the Main Report. Key results are summarised below in **Table NTS.4** and discussed at **Section 5.2** and a detailed matrix provided at **Appendix E**

**Table NTS.4 Appraisal of Reasonable Alternatives for the Spatial Strategy**

Sustainability Objective (SO)	Option 1	Option 2	Option 3	Option4
SO1: Town Centres	++	++/?	++/-/?	+/-/?
SO2: Neighbourhoods	++/?	++/?	++/-/?	+/-/?
SO3: Place-making	?	?	?	?
SO4: Employment	+/?	+/?	+/?	+/?
SO5: Economic benefits	++/?	++/?	++/?	++/?
SO6: Education	+	+	+	+/?
SO7: Housing stock	+	+	+	+/?
SO8: Housing supply	+	+/?	+	+/?
SO9: Climate change	+	+/?	+/?	+/?
SO10: Sustainable design	+	+/?	+/?	+/?
SO11: Natural resources	+/-/?	+/-/?	+/-/?	+/-/?
SO12: Flood risk	+	+/?	+/?	+/?
SO13: Land quality	0	0	0	0
SO14: GBI	+	+/?	+/-/?	+/?
SO15: Biodiversity	+	+/?	+/-/?	+/?
SO16: Sustainable transport	+	+/?	+/-/?	+/?
SO17: Waste	+/-/?	+/-/?	+/-/?	+/-/?
SO18: Community facilities	+	+/?	+/-/?	+/?
SO19: Inclusion	+	+/?	+/-/?	+/?
SO20: Young people	+	+	+	+



Sustainability Objective (SO)	Option 1	Option 2	Option 3	Option4
SO21: Crime	0	0	0	0
SO22: Health and wellbeing	+	+	+	+

In terms of likely significant effects:

- Options 1,2 and 3 could have significant positive effects in relation to SO1: 'Town centres', although there is some uncertainty as to how development would be distributed across the borough under Options 2 and 3 and the potential for minor negative effects on other centres is identified under these two options, with some uncertainty.
- Options 1,2 and 3 could have significant positive effects in relation to SO2: 'Neighbourhoods' as they would all direct development to neighbourhoods to some degree. Option 3 could give rise to negative effects as not all neighbourhoods may be able to accommodate growth at the scale required.
- Outcomes relating to SO5: 'Economic benefits' are potentially significant with some uncertainty.

Option 1 provides the most potential for benefits to be shared (and therefore potentially retained) across the borough.

Option 1 could also provide opportunity for the greatest granularity/level of detail for local planning, if based on 16 neighbourhoods, rather than the 6 neighbourhoods associated with Option 2.

The Council's preferred option is Option 1 because it is consistent with the London Plan 2021 by following a design and character-led approach to where growth can be accommodated as well as the role of small sites in delivering incremental change. Option 1 ensures the benefits of growth are distributed across the borough in line with council objectives, both through new housing and through services and facilities as part of the 15 minute neighbourhood principle.

## The approach to planning for 15 minute neighbourhoods

The reasonable alternatives identified by the Council are summarised in **Table NTS.5**.

Option	Description	Reason for consideration
1	Creating a network of 15 minute neighbourhoods which ensures all residents have access to community facilities, transport, employment opportunities and shops within easy reach of their homes. Through new district centre at Beckton Riverside, new and expanded local centres protecting and expanding the borough's network of neighbourhood parades and by directing these uses primarily to Town Centres, as well as allowing smaller facilities to be located in a wider range of locations to reduce gaps in the 15 minute network.	Proposed approach in the Draft Local Plan.
2	Maintain town centre first approach without looking to fill the gaps in the 15 minute network	Follows the town centre first approach in the NPPF and London Plan 2021 and approach in the current adopted Plan.
3	No restrictions on scale or location of these uses (retail and community uses) outside of designated centres to fill all gaps in the 15 minute network	Firmer adherence to 15 minute neighbourhood principles which may increase access to services, shops, employment and community facilities across the borough.

The results of the assessment are discussed in **Section 5.3**, with a matrix provided at **Appendix E** and are summarised in **Table NTS.6**.

**Table NTS.6 Appraisal of Reasonable Alternatives for planning for 15 minute neighbourhoods**

Sustainability Objective (SO)	Option 1	Option 2	Option 3
SO1: Town Centres	++	++	++/?
SO2: Neighbourhoods	++	++	++
SO3: Place-making	+/?	+	+/?
SO4: Employment	++	++	++
SO5: Economic benefits	++	++	++
SO6: Education	+	+/?	+
SO7: Housing stock	~	~	~
SO8: Housing supply	~	~	~
SO9: Climate change	+	+/?	+
SO10: Sustainable design	+	+	+
SO11: Natural resources	+/-	-	+/-
SO12: Flood risk	~	~	~

Sustainability Objective (SO)	Option 1	Option 2	Option 3
SO13: Land quality	~	~	~
SO14: GBI	~	~	~
SO15: Biodiversity	~	~	~
SO16: Sustainable transport	++	++/?	++/?
SO17: Waste	+/-/?	+/-/?	+/-/?
SO18: Community facilities	++	++	++
SO19: Inclusion	++	++	++
SO20: Young people	++	++	++
SO21: Crime	+	+	+
SO22: Health and wellbeing	~	~	~

All three options would see the creation of new development within existing centres, with Option 1 creating a new district centre and local centres. Option 3 could harm the vitality or viability of existing town centres at the same time, by encouraging town centre uses outside of designated centres (and uncertainties are identified on that basis). A significant positive effect is therefore identified for SO1: 'Town Centres' in relation to all options.

All three options would provide retail, leisure cultural and potentially other development associated with centres within the borough. Options 1 and 3 have the potential to provide such development in more places than Option 2, as these policies are more likely to create new town centres and/or requires for such uses to be spread out across the borough (under the 15 minute neighbourhood principle), potentially increasing access and choice. A significant positive effect is therefore identified for SO2: 'Neighbourhoods'.

All three options would enable new retail related economic development within the borough and would therefore have significant positive effects (subject to any negative impacts on existing uses). Option 2 would limit such opportunities to existing town centres, which could prejudice the ability of people to set-up business (as available space will likely be limited and rents will be potentially higher than other locations). Option 1 would create a new district and local centres, potentially providing wider locational choice. Similarly, Option 3 would achieve this by allowing retail and community uses across the borough, providing the most choice. A significant positive effect is therefore identified for SO4: 'Employment' and SO5: 'Economic benefits'.

All three options would create development within Newham that would create highly accessible places containing town centre uses and community facilities. Option 2 would be limited to only improving/expanding existing town centres, potentially meaning residents have to use less sustainable transport to reach needed services as none are located nearby. Option 1 and 3 would provide highly accessible places in a wider variety of places (especially Option 3). The impact of Option 3 is difficult to gauge, a more dispersed pattern of provision might reduce the distance travelled and encourage walking and cycling, equally it might lead to more travel by car if development takes place in areas where Public Transport Accessibility Levels are low, as the provision of retail and community facilities becomes more dispersed. A significant positive effect (with uncertainty) is therefore identified for SO16: 'Sustainable transport'.

All three options would have significant positive effects due to allowing for the creation of new community facilities. Option 2 would keep such facilities to existing centres, whilst Option 1 and Option 3 would allow for such facilities in more places (especially Option 3). A significant positive

effect is therefore identified for SO18: ‘Community facilities’, SO19: ‘Inclusion’ and SO20: ‘Young people.’

Option 1 is the Council’s preferred option because: it reflects evidence in the Retail and Leisure Study on how the town centre hierarchy is performing and analysis of where gaps exist for town centre uses and community facilities as part of the 15 minute network. Option 1 also provides a better reflection of the existing spatial distribution of community facilities and resident feedback that they play a valued role outside of Town Centres. It enables the commitment to delivering the Council’s objective for residents to live in 15 minute neighbourhoods, whilst balancing the protection of the vitality of Town Centres and limiting highways and amenity impacts.

## Quantum of Employment Land for Industrial Uses to 2038

The reasonable alternatives identified by the Council are summarised in **Table NTS.7**.

**Table NTS.7 Reasonable alternatives for the quantum of employment land for industrial uses to 2038**

Option	Description	Reason for consideration
1	Plan for 335,000 sq m of new industrial floorspace	Reasonable alternative identified in the Employment Land Review 2022 based on the past trends (jobs) approach which is higher than the forecast figure.
2	Plan for 127,000 sqm of new industrial floorspace	Reasonable alternative identified in the Employment Land Review 2022 based on a 5 year past annual average floorspace trend projected forward for the Plan period. Such an approach could reduce the land take needed and provide land for other uses, such as housing.
3	Plan for 197,000 sq m of new industrial floorspace.	Reasonable alternative identified in the Employment Land Review 2022 based on economic forecasts. Such an approach could reduce the land take needed and provide land for other uses, such as housing.

Key results are summarised in **Table NTS.8** and discussed in **Section 5.4** and **Appendix E**.

**Table NTS.8 Appraisal of Reasonable Alternatives for the quantum of employment land for industrial uses**

Sustainability Objective (SO)	Option 1 - 335,000 sqm industrial floorspace to 2038	Option 2 – 127,000 sqm industrial to floorspace 2038	Option 3 - 197,000 sqm industrial to floorspace 2038
SO1: Town Centres	+	+	+
SO2: Neighbourhoods	~	~	~

Sustainability Objective (SO)	Option 1 - 335,000 sqm industrial floorspace to 2038	Option 2 – 127,000 sqm industrial to floorspace 2038	Option 3 - 197,000 sqm industrial to floorspace 2038
SO3: Place-making	~	~	~
SO4: Employment	++	++/?	++/?
SO5: Economic benefits	++/?	++/?	++/?
SO6: Education	+	+	+
SO7: Housing stock	~	~	~
SO8: Housing supply	-/?	-/?	-/?
SO9: Climate change	+/-/?	+/-/?	+/-/?
SO10: Sustainable design	0	0	0
SO11: Natural resources	+/-/?	+/-/?	+/-/?
SO12: Flood risk	0	0	0
SO13: Land quality	0	0	0
SO14: GBI	0	0	0
SO15: Biodiversity	0	0	0
SO16: Sustainable transport	+/-/?	+/-/?	+/-/?
SO17: Waste	+/-/?	+/-/?	+/-/?
SO18: Community facilities	~	~	~
SO19: Inclusion	+	+	+
SO20: Young people	+	+	+
SO21: Crime	~	~	~
SO22: Health and wellbeing	+	+	+

Significant positive effects have been identified for the options against SO4: 'Employment' and SO5: 'Economic benefits' due to the employment and economic benefits accommodating more industrial development would bring to Newham.

The relationship of the options to SO3: 'Housing' is complex given that the provision of land for employment might result in less land being available for housing. In consequence, all of the options could impact on the ability of the borough to provide additional housing, particularly Option 1 as the level of provision for industrial land is higher, however there is a clear tension between maximising housing provision and ensuring a balance between housing and employment provision



within the borough and the importance of Newham as a location for employment in the context of the wider London market for such floorspace.

Mixed positive and negative effects have been identified in relation to the following objectives: SO9: 'Climate change', SO11: 'Natural resources', SO16: 'Sustainable transport', and SO17: 'Waste'. It has been assumed that the potential adverse effects from industrial development would be mitigated by policies in the Local Plan and existing regulatory regimes, e.g. associated with emissions to air and water.

The industrial floorspace under consideration is associated with forecasted demand and, if not provided for in the borough, would potentially be provided outside of London. Displacing some of the effects identified, e.g. associated with greenhouse gas emissions (SO9: Climate change) but potentially losing opportunities for efficiencies associated with the movement of goods and materials and encouraging the circular economy (SO11: Natural resources).

Option 1 is the Council's preferred option. Economic evidence recommends planning for 335,000 sqm (approximately 51ha) of industrial to avoid constraining growth, maximise employment opportunities for residents and contribute to meeting the industrial needs including the wider property market areas i.e. the Central Activity Zone. The higher figure aligns with the market view of industrial demand and the need to take a positive approach of land for economic growth. This target is based on past (2009-19) jobs delivery trends and the Employment Land Review 2022 recommends planning for this figure.

## Local Plan Vision and Objectives

The vision for Newham as contained within the draft Local Plan is out in **Section 1.3** of this Report.

The vision for the borough seeks to ensure the rapid growth and change within Newham results in a fairer, healthier, and happier place. This will be achieved through encouraging economic and community growth and identity. The vision places great importance on creating more affordable housing within Newham, whilst also ensuring residents have access to sufficient open and green spaces. The businesses, leisure and residential places of the borough should also be transformed to encourage walking and cycling and ensuring residents and visitors have access to whatever they need by such transportation methods. The vision also carries the Council's considerable desire to continue to reduce Newham's contribution to climate change and improve its resilience to the growing effects of it. The vision has broadly been assessed as being compatible with the majority of the IIA objectives.

The objectives included in the draft Local cover a wider range of economic, socio-economic and environmental themes and are taken from the Building a Fairer Newham Strategy (BaFNS) (2022). Given the nature of the strategy and its associated objectives, none of the objectives have been assessed as being incompatible with the IIA Objectives.

## Assessment of Strategic Policies

Policies in the draft Local Plan cover the following topics:

- Building a Fairer Newham (incl. spatial strategy and health & social value);
- Design;
- High Streets;
- Community Facilities and Education;
- Economy;
- Homes;

- Green and Blue Spaces;
- Climate and Flood;
- Transport;
- Waste and Utilities,

This report concludes that the draft Local Plan that is currently being consulted on is anticipated to have significant positive effects across a number of the SA objectives, including:

- Creating a network of 15 minute neighbourhoods to ensure everyone has access to the services and facilities they need, contributing to a more sustainable pattern of development, which will contribute to a range of the objectives, including SO1: 'Town Centres'; SO2: 'Neighbourhoods', SO9: 'Climate change', SO14: 'GBI', SO16: 'Sustainable transport', SO19: 'Inclusion', SO20: 'Young people' and SO22 'Health and wellbeing';
- Providing a range of housing (especially affordable housing), including housing for older people and other specialist needs, which will contribute to a range of the objectives, including: SO7: 'Housing stock', SO8: 'Housing supply' and SO19: 'Inclusion';
- Expanding Newham's economy by providing space for employment in suitable locations and retaining economic benefits within Newham, which will contribute to a range of the objectives, including SO4: 'Employment', SO5: 'Economic benefits' and SO19: 'Inclusion';
- Protecting existing areas identified for industrial and employment use, whilst still allowing mixed-use sites to be developed to ensure there is sufficient flexibility in appropriate sites within Newham, which will contribute to a range of the objectives, including: SO4: 'Employment', SO5: 'Economic benefits' and SO19: 'Inclusion';
- Creating a network of centres, including the protection of existing town centres, local centres, small parades and local shops and see their expansion where appropriate; SO18: 'Community facilities', SO19: 'Inclusion' and SO20: 'Young people';
- Achieving high quality design – through policies that require masterplanning that creates inclusive communities and ensure that account is taken of the how new development relates to existing uses which will contribute to a range of the objectives, including: SO19: 'Inclusion', SO21: 'Crime' and SO22: 'Health and wellbeing';
- Providing sufficient social community, education and health services and facilities, which will contribute to a range of the objectives, including: SO16: Sustainable transport, SO18: 'Community facilities', SO19: 'Inclusion' and SO22: 'Health and wellbeing';
- Protecting and enhancing Green and Blue Infrastructure to address existing shortfalls in provision, including the provision of play space which will contribute to a range of the objectives, including SO14: 'GBI', SO15: 'Biodiversity', SO16: 'Sustainable transport', SO19: 'Inclusion', SO20: 'Young people' and SO22: 'Health and wellbeing';
- Encouraging more sustainable forms of transport, especially active travel methods which will contribute to a range of the objectives, including: SO9: 'Climate change', SO16: 'Sustainable transport' and SO22: 'Health and wellbeing';
- Managing resources, including minerals and waste more sustainably, which will contribute to a range of the objectives, including: SO10: 'Sustainable design', SO11: 'Natural resources' and SO17: 'Waste'; and

- Mitigating the borough's contribution to climate change whilst ensuring that new development adapts to changes that are already anticipated, especially with regard to flood risk and overheating, which will contribute to a range of the objectives, including: SO9: 'Climate change', SO10: 'Sustainable design', SO11: 'Natural resources' and SO12: 'Flood risk'.

Development, particularly of the scale envisaged in Newham will inevitably mean an increase in the use of resources and energy during the construction and operational phases of development. These negative effects have already been account for through consideration of the London Plan 2021 and planning for Opportunity Areas, where significant development is envisaged. The Local Plan is responding to the requirement for housing set out in the London Plan 2021 and Opportunity Area Planning Frameworks. The potential for significant negative effects in relation to SO9: 'Climate change' and SO11: 'Natural resources'. The draft Local Plan sets out policies to ensure that development is net zero carbon and seeks to support and enable local supply chains. The Joint Waste Local Plan will include additional policy in relation to the management of waste.

## Policies for Neighbourhoods and Allocations

The Local Plan identifies 16 neighbourhoods and provides a policy for each of these. Some of the neighbourhoods are then supported by site allocations which are also supported by policies.

**Section 5.7** of the Main Report considers the neighbourhood policies and **Appendix G** provides more detail with a matrix on each neighbourhood. Recommendations are set out in **Table 5.16**.

**Section 5.8** provides more detail on the assessment of allocated sites and **Appendix H** provides more detail with a matrix for each site.

The neighbourhood and site policies are key to delivering the network of 15 minute neighbourhoods identified in the Local Plan's vision. Significant positive effects are identified in relation to a range of the IIA objectives, similar to those associated with thematic policies. These effects are expected to be particularly significant in respect of: housing (SO8: 'Housing supply'), neighbourhoods (SO2: 'Neighbourhoods'), employment (SO4: 'Employment'), education (SO6: 'Education'), open spaces (SO14: 'GBI'), transport (SO16: 'Sustainable transport'), community facilities (SO18: 'Community facilities'), health and well-being (SO22: 'Health and wellbeing').

The exact scale of housing development which will come forward on each site allocation will depend on further detailed site design work undertaken through the application process. A range of housing capacities could be delivered while still meeting the design, housing, neighbourhood and site allocation policies and design requirements in the draft Local Plan. As such all allocations delivering housing are assumed to have a significant positive effect, with a degree of uncertainty. This approach may be further refined as preparation of the Local Plan progresses.

Whilst the draft Local Plan performs well against the IIA objectives, some potential for significant negative effects has been identified. Newham due to its location and existing built environment experiences flood risk issues, which the new development required by the draft Local Plan would have to consider and address. This led to certain aspects of the draft Local Plan scoring a significant negative against SO12: 'Flood risk' (primarily the allocated sites). The need to strengthen existing flood defences and ensure that development adapts to and mitigates flood risk is recognised in the Local Plan and no additional mitigation is suggested. Similarly, the Local Plan contains policies to mitigate potential significant effects in relation to heritage (SO3: Place making).

## Cumulative, Synergistic and Secondary Effects of Policies and Sites

Potential cumulative effects have been identified through professional judgement having regard to the overall performance of policies and how they might interact against specific IIA objectives. The text and table also consider the potential for cumulative and synergistic effects associated with

other relevant plans and programmes (primarily the London Plan 2021). **Section 5.9** of the main report consider the potential for such effects and these are summarised in **Table NTS.9**.

**Table NTS.9 Cumulative, Synergistic and Secondary Effects of Policies and Sites**

IIA Objectives	Building a Fairer Newham	Community Facilities	Design	Green and Blue Spaces	Economy	High Street	Homes	Climate Change	Transport	Waste and Utilities	Neighbourhood Policies & Site Allocations
SO1: 'Town Centres'	+	+	+	+	++	+	+	+	+	+	++
SO2: 'Neighbourhoods'	+	++/?	+	++/?	+	+	+	+	++	+	++
SO3: 'Place-making'	+	+	+	++	+	+	+	+	++	+	++/-
SO4: 'Employment'	+	++	~	+	++	+	~	+	++	+	++
SO5: 'Economic benefits'	+/?	+	~	+	++	+	~	~	+	+	++/?
SO6: 'Education'	+	++	~	+	~	~	+	~	++	+	++
SO7: 'Housing stock'	+	~	~	~	~	~	~	~	~	~	++
SO8: 'Housing supply'	+	~	+	~	~	+	+	~	~	~	++
SO9: 'Climate change'	+/--/?	~	+	+	+	~	~	++	+	+/?	+/--/?
SO10: 'Sustainable design'	+	+	+	~	~	~	~	++	++	+	+
SO11: 'Natural resources'	+	~	+	++	+	~	~	+	+	++/?	++/?
SO12: 'Flood risk'	+	~	~	~	~	~	~	++	~	~	--



IIA Objectives	Building a Fairer Newham	Community Facilities	Design	Green and Blue Spaces	Economy	High Street	Homes	Climate Change	Transport	Waste and Utilities	Neighbourhood Policies & Site Allocations
SO13: 'Land quality'	+	~	~	+	~	~	~	~	~	~	++
SO14: 'GBI'	+	~	+	++/?	~	~	~	~	~	~	++/?
SO15: 'Biodiversity'	+	~	+	++	~	~	~	~	+	+	++/-/?
SO16: 'Sustainable transport'	+	+	+	++	~	~	+	+	++	~	++/-
SO17: 'Reducing waste'	~	~	+	~	+	+	~	~	~	+	0
SO18: 'Community facilities'	+	++	+	+	~	+	+	~	++	+	++
SO19: 'Inclusion'	+	++	+	++/?	+	+	++	~	+	+	++
SO20: 'Young people'	+	++	~	~	+	+	+	~	+	~	++
SO21: 'Reducing crime'	+	+	+	+	+	+	+	~	+	+	+
SO22: 'Health and wellbeing'	+	++	+	++/?	+	+	+	+	++	+	++

## Health Impact Assessment

The extent to which the draft Local Plan policies will contribute to each of the priorities identified in the HIA Framework has been considered. Overall, the HIA identifies that the policies in the draft Local Plan will make positive contributions against the topics considered, one potential gap in relation to the design of buildings to reduce the risk of suicide was identified and a recommendation has been made, suggesting that the Local Plan incorporate a suitable criterion in one of the design policies. The approach to HIA is discussed in **Section 4.5**, with findings summarised in **Section 5.10** and full HIA presented in **Appendix I** of the IIA report.

## Equalities Impact Assessment

The Council has developed an EqIA Framework which guides the EqIA of the draft Local Plan and later versions of the document. **Section 4.5** of this report provides more information on the approach to the EqIA.

There are policies in the draft Local Plan which, while not focussed on people who share Protected Characteristics, could have significant positive effects. These include policies relating to the provision of a range of housing, employment (e.g. J1 'Employment and Growth', green infrastructure (e.g. GWS1 'Green spaces'), transport (e.g. T2 'Local Transport') and community infrastructure.

It is also important to note that the Council undertakes EqIAs for regeneration projects that involve sites that are proposed to be allocated in the Local Plan, including Canning Town and Custom House and Carpenters Estate. This should help ensure that relevant issues are considered as proposals for these areas develop. Residents' Charters set out the rights of residents and those affected by any redevelopment proposals, as well as the Council's obligations and commitments.

On the basis of the review set out at **Section 5.11** and **Appendix J** and the above it is concluded that the Local Plan exhibits due regard to the Council's Public Sector Equality Duty. Steps will be taken to ensure due regard for the nine protected groups is embedded in the process to produce and the policies of the Local Plan as it continues to develop.

## Habitats Regulations Assessment

Natural England provided comments on the approach to the HRA in their response to the IIA Scoping Report (October 2021).

The HRA process has considered the potential for the Local Plan to affect European sites within 20 km of the borough boundary; these sites are:

- Epping Forest Special Area of Conservation (SAC);
- Lee Valley Special Protection Area (SPA);
- Lee Valley Ramsar;
- Wimbledon Common SAC; and
- Richmond Park SAC.

The HRA process is described in Section 4.6 of this report. The HRA is available as a free standing report.

The issues considered in the HRA include:

- Air quality, including 'in-combination' effects;
- Public access / visitor pressure; and

- Water quality.

The HRA is an iterative process which will continue to assess the draft Local Plan as it progresses through to adoption.

## **Next Steps**

This IIA Report has been issued for consultation alongside the Draft Regulation 18 Local Plan Refresh. The Council's [website](#) provides details on the Local Plan review and the current consultation.

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# 1. Introduction

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## 1.1 Background

- 1.1.1 The London Borough of Newham's Local Plan currently comprises the Local Plan (2018), Gypsy and Traveller Accommodation Development Plan Document (DPD) (2017) and the Joint Waste Plan (2012). London Borough of Newham Council (the Council) has commenced a refresh of the Local Plan – in response to updated Newham objectives and strategies; changes in the development context and market trends; and updated national and regional planning requirements. This will result in an updated Local Plan incorporating policy for Gypsy and Traveller accommodation.
- 1.1.2 The Council engaged Wood Environment & Infrastructure Solutions UK Ltd to undertake an Integrated Impact Assessment (IIA) of the Local Plan. In September 2022 Wood Environment & Infrastructure UK Ltd became part of WSP. IIA incorporates Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA).
- 1.1.3 This document is the Integrated Impact Assessment (IIA) of the Regulation 18 version of the London Borough of Newham's Local Plan refresh (the draft Local Plan).

## 1.2 The Draft Local Plan

- 1.1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the regulatory requirements for developing and adopting a Local Plan. Before adoption, this involves preparing and consulting on what the local plan should contain (Regulation 18), producing a Publication Draft Local Plan (Regulation 19), submitting the Local Plan to the Secretary of State for Housing, Communities and Local Government (Regulation 22) and subjecting the Local Plan to public examination (Regulation 24).
- 1.1.2 The Newham Local Plan sets out the spatial strategy for Newham for a fifteen-year period between 2023 and 2038. The spatial strategy identifies the location, scale and uses of development that will come forward in Newham and demonstrates how needs of Newham's current and future population will be met. This includes the need, set by the London Plan 2021, to deliver at least 47,600 additional homes in Newham over the period 2019/20 to 2028/29. The Newham Local Plan also seeks to meet Newham's needs for:
- a requirement for 335,00 sqm of industrial floorspace;
  - a minimum requirement for 90,000 sqm of office floorspace; and
  - 25,973sqm of retail floorspace.
- 1.1.3 The Borough's Local Plan is also bound to, and will be tested against, its general conformity and compliance with the London Plan 2021. The London Plan 2021 is the Spatial Development Strategy for Greater London and sets out a regional vision and policies that cover housing, transport, employment and the environment.
- 1.1.4 The creation of the London Legacy Development Corporation (LLDC) removed a portion of land around Stratford from the remit of the London Borough of Newham as the Local Planning Authority. The LLDC's planning powers are due to be handed back to boroughs by the end of 2024. The Council is working with the LLDC, Mayor of London and other host boroughs to plan proactively in advance of this transition, so that a Plan which covers

the whole borough is ready at the point of transition. This draft Local Plan therefore covers the entirety of Newham.

- 1.1.5 The new Local Plan will replace the adopted Local Plan (2018). The review of the Local Plan will include three rounds of consultation and engagement. The first round of engagement on the Issues and Options document took place between the 18 October and the 17 December 2021.

## Policy Context

- 1.1.6 Key documents that set the policy context for the IIA are briefly discussed below. The focus is on documents that define sustainable development and / or set the planning context within the UK and London. Under section 39(2) of the Planning and Compulsory Purchase Act (PCPA) 2004, a local authority exercising their plan making functions must do so with the objective of contributing to the achievement of sustainable development.

### National Planning Policy Framework (NPPF)

- 1.1.7 The National Planning Policy Framework (NPPF) (July 2021) sets out the government's planning policies for England and how these are expected to be applied. The NPPF must be taken into account in the preparation of Local and Neighbourhood Plans and is a material consideration in planning decisions. It states that in order to be considered sound, a Local Plan should be consistent with national planning policy.
- 1.1.8 The NPPF states (paragraph 19) that *“the development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time”*.
- 1.1.9 Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for (paragraph 20):
- *“Housing (including affordable housing), employment, retail, leisure and other commercial development;*
  - *Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
  - *Community facilities (such as health, education and cultural infrastructure); and*
  - *Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*
- 1.1.10 The NPPF states (paragraph 28) that *“non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.”*

### The NPPF and Sustainable Development

- 1.1.11 The NPPF cross references Resolution 42/187 of the United Nations General Assembly, which defined sustainable development as:
- “Meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*

- 1.1.12 Paragraph 7 of the NPPF reiterates the requirements of section 39 (2) of the PCPA 2004:  
*“The purpose of the planning system is to contribute to the achievement of sustainable development.”*
- 1.1.13 Paragraph 8 of the NPPF states:  
*“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*
- 1.1.14 Paragraph 11 of the NPPF states that:  
*“Plans and decisions should apply a presumption in favour of sustainable development.”*
- 1.1.15 Paragraph 32 of the NPPF states that:  
*“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”*

### National Planning Practice Guidance (PPG)

- 1.1.16 In March 2014 the Department for Communities and Local Government (DCLG) (now the Department for Levelling Up, Housing and Communities (DLUHC) launched the Planning Practice Guidance (PPG) web-based resource. This was accompanied by a Written Ministerial Statement which includes a list of the previous planning practice guidance documents cancelled when this site was launched.
- 1.1.17 The PPG outlines the purpose and key issues for a Local Plan (Paragraph: 001 Reference ID: ID: 61-001-20190315):  
*“The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and*

*enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. It is essential that plans are in place and kept up to date.”*

- 1.1.18 PPG also reiterates the role of sustainability appraisal in plan preparation (Paragraph: 018 Reference ID: 11-018-20140306):

*“The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:*

- *Outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- *As part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them; and*
- *Provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.*

*Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.*

*The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.”*

## London Plan

- 1.1.19 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a regional vision and policies that cover housing, transport, employment and the environment amongst others. The Borough’s Local Plan is bound to, and will be tested against, its general conformity and compliance with the London Plan 2021. The London Plan 2021 and associated Supplementary Planning Guidance (SPG) also includes a range of policies relating to new development, which the Local Plan should not seek to duplicate. The Mayor published the London Plan on 2<sup>nd</sup> March 2021.
- 1.1.20 Opportunity Areas are identified in the London Plan 2021 that offer scope for change and growth and can provide a substantial number of new jobs and homes, as well as providing much needed local facilities such as local shops and schools. The ability of these opportunity areas to deliver such growth is strongly linked to existing or potential transport improvements. Newham is home to three Opportunity Areas: Royal Docks and Beckton Riverside and the Poplar Riverside and Olympic Legacy cross boundary Opportunity Areas. The Mayor of London is developing the Royal Docks and Beckton Opportunity Area Planning Framework (OAPF) and it will soon be published as London Plan 2021 Guidance. This means it provides additional guidance on how the London Plan 2021 should be interpreted and delivered in this part of the borough. The Council have also used the OAPF to help inform parts of the draft Local Plan.



## 1.3 Overview of the Draft Local Plan

1.3.1 The structure of the draft Local Plan is summarised below:

### Vision and Objectives

1.3.2 The Regulation 18 draft Local Plan also includes vision and a set of objectives, reflecting the Building a Fairer Newham Strategy (2022). All developments in the borough are expected to support and contribute towards the delivery of these objectives. The vision is stated below:

*“No other borough is being transformed at the pace and scale that Newham is both currently experiencing and will be over the next 15 years. Our vision is for this transformation to build a fairer, healthier and happier borough where creativity, diversity, an inclusive economy and community spirit can flourish and residents feel proud of where they live.*

*In some of our 16 neighbourhoods change will be radical: As City Hall makes its new home in Royal Victoria, the area around it and the wider docks, which were isolated industrial sites, will become new connected, lively areas of our borough, home to existing and future Newham residents as well as businesses engaged in the new green, digital and creative industries. These new communities will be matched in scale and ambition by a new major town centre, connected by a DLR extension, at Beckton Riverside/Gallions Reach. Here a new city district will provide homes, modern industrial jobs and access to nature and the Thames.*

*Along the River Lea, through Canning Town and Manor Road and Three Mills new bridges and walkways will link residents to natural spaces, stations and neighbouring boroughs. At Canning Town and Custom House, the Elizabeth Line will serve newly regenerated and restored estates built around community facilities and local shops. In Stratford improved connectivity and targeted development will ensure the global ambitions of the Olympic legacy delivers lasting benefits for all of Newham.*

*In many more neighbourhoods, changes will be smaller but no less important. These changes, such as at Forest Gate and Queen’s Market will enhance our shared built and cultural heritage. Our six town centres and 13 local high streets will be cherished spaces to meet, shop locally and explore.*

*Developments across our neighbourhoods will create new green, well designed, affordable homes. New spaces where businesses can grow, including in the East Beckton Town Centre, Parcellforce and Thameside West will create high quality and well-paying local jobs – ensuring wealth created in our community stays in our community.*

*New development, including at Custom House, Plaistow North and Pudding Mill Lane, will provide opportunities to complete our network of 15 minute neighbourhoods, delivering the shops, community facilities and parks which bring our neighbourhoods to life and provide spaces for us to meet.*

*This will be complemented by interventions which make Newham a safe and enjoyable place to move around. Walking, cycling and public transport will be prioritised on clean, safe, green and attractive streets where all feel welcome.*

*This growth will not compromise our commitment to tackling the climate emergency. New development will be zero carbon and retrofitting existing buildings will be supported and accelerated. Our network of parks, open spaces, docks and*

*riversides will grow and flourish. Climate resilient and nature filled neighbourhoods will help residents and local wildlife live safely and healthily in a changing environment.*

*Instrumental in delivering this vision will be collaboration to bring together residents, local organisations, the council and developers to build trust and understanding about what is needed and achievable in each of Newham's 16 neighbourhoods. Young people in particular will be welcomed and planned for, ensuring they retain and enduring stake in their future and the borough's."*

1.3.3 The objectives are reproduced in **Box 1** below.

### **Box 1      Local Plan Objectives**

#### 1. A healthier Newham and ageing well

- The importance of physical and mental health and well-being will be recognised, to ensure we reduce health inequalities through a health integrated approach to planning.
- Healthy lifestyles will be promoted through the creation of healthy environments with clean air, no food deserts and no food swamps.
- We will measure the health, happiness and wellbeing of our residents to monitor the success of developments and the Local Plan

#### 2. An inclusive economy to support people in these hard times

- All residents will have access to local job opportunities, education, training and skill development.
- Our local economy will be supported through improving the quantity, range and affordability of employment space.
- We will support the delivery of the Capital's first London Living Wage neighbourhood.
- Access to employment through sustainable transport infrastructure and active travel will be improved.
- Business and residents will have access to the utilities and digital infrastructure required to function in the new economy.
- We will create a greener and cleaner future in Newham to tackle the climate emergency through creating zero carbon, climate resilient neighbourhoods.

#### 3. People-friendly neighbourhoods with green and clean streets

- We will create well-designed, clean, 15 minute neighbourhoods which encourage physical activity, active travel and reduced car use resulting in greener streets and public spaces.
- Provision of, and access to, high streets, community facilities, open space, will be increased through the delivery of 15 minute neighbourhoods.
- Zero-carbon development will be delivered alongside, retrofitting existing buildings and building climate resilient neighbourhoods, to support tackling the climate emergency.
- We will ensure our unique and diverse heritage is protected and celebrated requiring new development to be well-designed and that old and new buildings are well integrated.

#### 4. Safer Newham where no-one feels at risk of harm



- Crime and fear of crime will be reduced and safe spaces and streets will be created through the implementation of secured by design and activation principles.
5. Homes for residents
- We will deliver sufficient homes to meet the diverse needs of our population and offer improved quality of housing and a range of specialist housing options to provide care choices, greater independence and support.
  - Housing quality across the borough will be improved.
  - Delivery of family and affordable homes will be prioritised, to meet our most pressing needs.
  - Housing design will Recognise, celebrate and function well for Newham's diverse communities.
6. Supporting young people to have the best start in life and reach their potential
- Our public spaces, play spaces and social infrastructure will create high quality, safe, fun and welcoming spaces for all young people.
  - We will protect existing and deliver new, and improved access to, education and childcare provision.
  - Skills and career development will be provided to support young people's long term employment prospects in growth sectors.
7. People powered Newham and widening participation in the life of the Borough and the work that the Council does
- We will create a more equal and affordable borough which reduces poverty and increases civic participation and inclusive opportunities for all.
  - We will ensure there is sufficient physical, social, civic and digital infrastructure as part of inclusive growth and meets the needs of existing and future communities in Newham.
  - Co-design principles will be embedded in in delivering new development.
  - Access to high streets, community facilities (to enable support networks), and open space, will be improved through delivery of 15 minute neighbourhoods to create happier communities.
  - New development will improve social integration.
  - Cultural events, spaces and businesses will be supported.

## Policies

1.3.4 The draft Local Plan establishes planning policies for the following topics:

- Building a Fairer Newham (incl. spatial strategy and health & social value);
- Design;
- High Streets;
- Community Facilities and Education;
- Economy;

- Homes;
- Green and Blue Spaces;
- Climate and Flood;
- Transport;
- Waste and Utilities; and
- Neighbourhoods.

## Allocations and designations

- 1.3.5 The draft Local Plan allocates proposed larger sites that will provide new homes and other uses, including open space, employment, retail and community facilities and transport related infrastructure, The Local Plan also identifies a number of other designations, including town centre boundaries and employment designations.

## 1.4 Scope of the Integrated Impact Assessment

- 1.1.21 This IIA incorporates Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). Each of these components are discussed in turn below.

### Sustainability Appraisal (SA)

- 1.1.22 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects.

### Strategic Environment Assessment (SEA)

- 1.1.23 In undertaking the requirement for SA, local planning authorities must also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633). This is reflected in paragraph 32 of the NPPF. The Planning Practice Guidance (PPG) provides specific direction on undertaking SA of local plans and includes a checklist that details the regulatory requirements and where further information on compliance can be identified. The Government guidance for SEA is also relevant to undertaking an SA of a local plan.
- 1.1.24 In addition to regulations, planning policy and guidance, any SA will need to reflect the judgements arising from relevant SEA case law. This includes ensuring the equal treatment of reasonable alternatives within the SA, the presentation of reasons for selection and rejection of reasonable alternatives and the need to maintain an audit trail of decisions.
- 1.1.25 There is a requirement to consult on the scope of the SEA with statutory consultees (Historic England, Natural England and the Environment Agency). The Council prepared a Scoping Report to inform the assessment that accompanied the Issues and Options Consultation between October and December 2021. This included the contextual information used to inform the scope of the IIA, along with a draft IIA Framework to be used to complete the assessment. The information presented in the Scoping Report has been revised to reflect the latest available baseline information and the responses

received on the Scoping Report (summarised in **Appendix B**). The revised information has been included in this IIA Report (**Section 3**) and has been used to inform the assessments.

## Health Impact Assessment (HIA)

1.1.26 There is no statutory requirement for HIA. Policy GG3 of the London Plan 2021 ‘Creating a healthy city’ states that “*those involved in planning and development must assess the potential impacts of development proposals and Development Plans...., for example through the use of Health Impact Assessments.*” Undertaking HIA helps ensure that health and wellbeing are being properly considered in planning policies and proposals. The process looks at the positive and negative health and wellbeing impacts of development as well as assessing the indirect implications for the wider community. Within the context of the Local Plan, the aim is to assess the main health and wellbeing impacts of policies and proposals in order to identify any opportunities for the emerging planning policies to maximise the benefits and avoid any potential adverse impacts. The Council developed a framework for undertaking the HIA and consulted on this as part of the Scoping Report. The approach to HIA is discussed in **Section 4.5**, with findings summarised in **Section 5.10** and full HIA presented in **Appendix I** of this report.

## Equalities Impact Assessment (EqIA)

1.1.27 An EqIA is not a statutory requirement but is a tool to assist the Council in complying with requirements under the UK Equality Act 2010 and Public Sector Equality Duty, which requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. EqIA serves as a mechanism for ensuring that ‘due regard’ is given to minority groups in decision-making and the activities of the Council. This includes policies, procedures, projects and proposals. Legislation identifies nine protected characteristics and the EqIA considers the potential for effects on these.

1.1.28 The protected characteristics are:

- Gender;
- Race;
- Disability;
- Sexual orientation;
- Religion/belief;
- Marriage and Civil Partnership;
- Age;
- Gender reassignment; and
- Pregnancy / maternity.

1.1.29 The approach to EqIA is discussed in **Section 4.6**, with findings summarised in **Section 5.11** and the full EqIA is presented in **Appendix J** of this report.

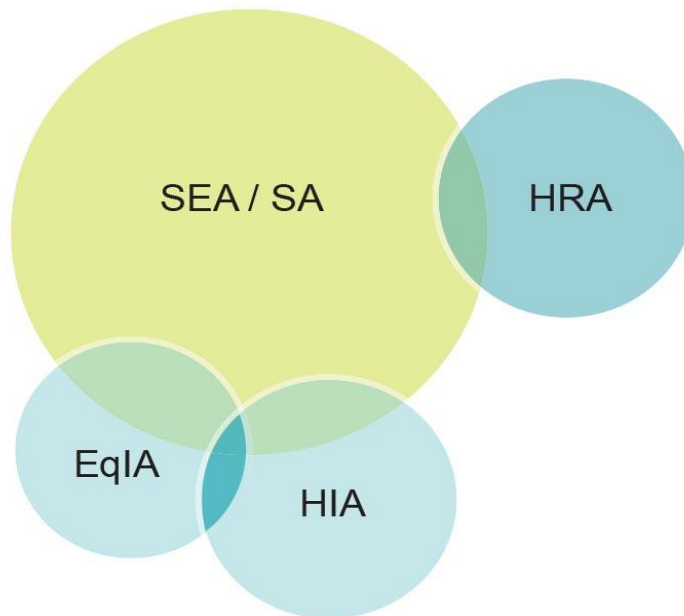
## 1.5 Habitats Regulations Assessment (HRA)

- 1.1.30 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the ‘Habitats Regulations’) states that if a land-use plan is “(a) *is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site*” then the plan-making authority must “...*make an appropriate assessment of the implications for the site in view of that site’s conservation objectives*” before the plan is given effect. The process by which Regulation 105 is met is known as Habitats Regulations Assessment (HRA). An HRA determines whether there will be any ‘likely significant effects’ (LSE) on any European site as a result of a plan’s implementation (either on its own or ‘in combination’ with other plans or projects) and, if so, whether these effects will result in any adverse effects on site integrity. The Council has a statutory duty to prepare the Local Plan and is therefore the Competent Authority for an HRA.
- 1.1.31 Whilst the HRA is a stand-alone assessment and report, its findings are typically included within the SA/SEA Report, particularly with regard to the appraisal of effects on biodiversity. The HRA is presented as a stand-alone report. The approach to HRA is summarised in **Section 4.6** of this report, with the key findings presented in **Section 5.12**.

## 1.6 Integrating the Different forms of Assessment

- 1.1.32 There are overlaps between the different forms of assessment and the SEA/SA as follows, see **Figure 1.1**:
- **HRA** – HRA requires an assessment of likely significant effects on European sites. European sites are a component of the many conservation features that will be considered under the biodiversity topic, identified in Schedule 2 of the SEA regulations. The datasets collected are useful to both assessment processes. The range of mitigation measures identified in the HRA in order to avoid, minimise or lessen any effects on a European site may also need assessment under the SEA regulations. Whether a plan or programme has an effect on European sites identified under the Habitats regulations is also a key consideration in determining whether the SEA regulations applies to a plan or programme;
  - **EqIA** – The SEA regulation requires consideration of issues relating to population and the datasets collected to provide a baseline for the topic are useful to both assessment processes; and
  - **HIA** – The SEA regulation requires consideration of issues relating to human health and the datasets collected to provide a baseline for the topic are useful to both assessment processes. Potential effects on European sites will include recreational disturbance which may have an effect related to health; and
- 1.1.33 There are also potential overlaps between HIA and EqIA because of the nature of the topics covered.

Figure 1.1 Overlaps between the different forms of assessment



1.1.34 IIA provides the opportunity for each form of assessment to inform the other, whilst ensuring that each strand of the assessment meets relevant expectations and requirements in relation to reporting.

## 1.7 Purpose of this Report

1.1.35 This report accompanies the Regulation 18 draft Local Plan.

1.1.36 The purposes of this report are to:

- Summarise the responses received on the IIA Scoping Report and to present the resulting revised approach; and
- Present the findings of the IIA of the Regulation 18 draft Local Plan and consideration of reasonable alternatives.

1.1.37 This report complies with relevant requirements set out in the SEA Regulations and a checklist is provided at **Appendix A** to demonstrate this.

## 1.8 Structure of this Report

1.1.38 This report is structured as follows:

- **Non-Technical Summary** - Provides a summary of the IIA Report including the findings of the appraisal of plan options;
- **Section 1: Introduction** - Includes a summary of the draft Local Plan consultation document, an overview of IIA, report contents and an outline of how to respond to the consultation;
- **Section 2: Review of Plans and Programmes** - Provides an overview of the review of those plans and programmes relevant to the Local Plan and IIA that is contained at **Appendix C**;

- **Section 3:** Baseline Analysis - Presents an overview of the Borough, updates to the baseline and the key sustainability issues that have informed the IIA Framework and appraisal;
- **Section 4:** Approach to the IIA - Outlines the approach to the IIA of the draft Local Plan including the IIA Framework, which is presented in **Appendix D**;
- **Section 5:** Appraisal of Effects – Presents the findings of the IIA of the draft Local Plan and options, with more detailed information presented in **Appendix E to H**; and
- **Section 6:** Conclusions and Next Steps – Presents the conclusions of the IIA of the draft Local Plan and details the next steps in the appraisal process.

## 1.9 How to Comment on this IIA Report

- 1.1.39 This IIA Report has been issued for consultation alongside the Draft Regulation 18 Local Plan Refresh. The Council's [website](#) provides details on the Local Plan review and the current consultation.

## 2. Review of Plans and Programmes

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### 2.1 Introduction

2.1.1 One of the first steps in undertaking the SA component of the IIA is to identify and review other relevant plans and programmes that could influence the Local Plan. The requirement to undertake a plan and programme review and identify the environmental and wider sustainability objectives relevant to the plan being assessed is set out in the SEA regulations. An 'Environmental Report' required under the SEA regulation should include:

*“An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes” to determine “the environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme...and the way those objectives and any environmental considerations have been taken into account during its preparation” (Schedule 2 (1), (5)).*

2.1.2 For the purposes of SA, the IIA Report should also meet the requirements of the Environmental Report required under the SEA regulation.

2.1.3 Plans and programmes relevant to the Local Plan may be those at an international/ European, UK, national, regional, sub-regional or local level, as relevant to the scope of the document. The review of relevant plans and programmes aims to identify the relationships between the Local Plan and these other documents i.e. how the Local Plan could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of their sustainability objectives. The review also ensures that the relevant environmental protection and sustainability objectives are integrated into the SA. Additionally, reviewing plans and programmes can provide appropriate information on the baseline for the plan area and help identify the key sustainability issues.

2.1.4 The completed review of plans and programmes has been used to help to inform the development of objectives and guide questions that comprise the IIA framework (see **Section 4.2 and Appendix D**).

### 2.2 Review of Plans and Programmes

2.2.1 Over a hundred European Union (EU), national, regional/sub-regional and local level plans and programmes have been reviewed. These documents are listed in **Appendix C**. The list includes a number of documents produced by the EU. Whilst the UK has now left the EU, these documents have been retained because they provide important topic specific guidance and advice. Many of the documents were also subsequently transposed into domestic legislation and are therefore also relevant in this respect. The plans and programmes that are listed have been identified to provide information to help cover the topics areas of the SEA regulations:

- Material Assets;
- Climatic Factors;
- Biodiversity;
- Fauna;



- Flora;
- Water;
- Soil;
- Air;
- Cultural heritage, architectural and archaeological heritage;
- Landscape;
- Population;
- Human health.

## 3. Baseline

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### 3.1 Introduction

- 3.1.1 An essential part of the SA process is the identification of the current baseline conditions and their likely evolution. It is only with a knowledge of existing conditions, and a consideration of their likely evolution, can the effects of the Local Plan be identified and appraised and its subsequent success or otherwise be monitored. The SEA regulations also requires that the evolution of the baseline conditions of the plan area (that would take place without the plan or programme) is identified, described and taken into account. This is also useful in determining the key issues for each topic that have been taken forward in the SA, through the SA objectives and guide questions.

### 3.2 Baseline conditions

- 3.2.1 The Scoping Report identified and characterised the current socio-economic and environmental baseline conditions for the Borough, along with how these are likely to change in the future.
- 3.2.2 To inform the analysis, data has been drawn from a variety of sources, including: 2011 Census; 2021 Census and Council Reports.
- 3.2.3 The baseline has been updated in light of comments on the information presented in the Scoping Report, any updated evidence base work and updated statistics on for example population and economic activity.

### 3.3 Evolution of the Baseline

- 3.3.1 Schedule 2 (2) of the SEA regulation requires the assessment to consider “the relevant aspects of the current state of the environment **and the likely evolution thereof** without implementation of the plan or programme” [our emphasis].
- 3.3.2 There are two external factors that will influence planning policy in the Borough without the Local Plan: the NPPF and the London Plan 2021. The NPPF is important, particularly Paragraph 11 d) which states:
- “where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*
- 3.3.3 The London Plan 2021 is important because it sets out a ten year target for net housing completions of at least 47,600 additional homes in the borough between 2019/20 and 2028/29, a target for net completions on small sites (3,800) and three Opportunity Areas, where growth is anticipated (see **Section 1.2** above).
- 3.3.4 The NPPF and the London Plan 2021 combined are likely to have a strong influence on how the Borough will develop if a Local Plan were not in place for any reason. The absence of a Local Plan would not mean that development in the Borough would come to

a halt. Proposals would be considered against the London Plan 2021 (including targets for housing and employment growth) and the provisions of the NPPF, including the presumption in favour of sustainable development.

- 3.3.5 The revised baseline presented below includes trend information, where available, to provide an informed understanding of the evolution of the baseline without the Local Plan. The Scoping Report provides additional baseline information.

## 3.4 Borough Portrait

- 3.4.1 In addition to the summary picture given here, the [www.newham.info](http://www.newham.info) website provides a range of data about the Borough (including “Key Facts” infographics updated twice a year). It should be noted that the data from the 2021 Census has not yet been fully released.

## 3.5 Ethnic Diversity and language

- 3.5.1 Newham has seen significant population changes: 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 72% of the population in 2021 – a significant increase from 61% in 2001 (GLA 2016, Housing led demographic projections 2016).
- 3.5.2 Within the population, Indian is the largest group with a 15% share, followed by Bangladeshi (12%), Black African (11%) and Pakistani (10%) (GLA 2016, Housing led demographic projections). No single group makes up more than a fifth of the population.
- 3.5.3 Over 100 languages are spoken in the borough with English being the most common followed by Bengali, Urdu and Gujarati (GLA 2019). Forty-one per cent of the population over three years-old do not have English as their main language (Census, 2011).

## 3.6 Population

- 3.6.1 The overall population of London has continued to grow since the 1990s, but Newham’s growth has been at an even faster rate than average, rising from 216,300 in 1991, 249,411 in 2001, 310,400 in 2011 to 351,100 in 2021 (ONS 2021, Demographic Projections). The growth rate of 31% between 2007 and 2017 was double that experienced by London as a whole (14%).
- 3.6.2 Newham’s population growth is in keeping with wider population growth in the south east of England. London’s population has grown by 7.7% since 2011, with the East of England growing by 8.3% and South East by 7.5% (Census, 2021). Newham has grown by 14% to a population of 351,100 residents in 2021, which is a considerably higher growth rate than that experienced by England as a whole (6.6% growth rate) (Census, 2021). Newham is ranked 24<sup>th</sup> out of the 309 local authority areas within England for its population size, moving up 10 spaces in a decade (Census, 2021).
- 3.6.3 Newham’s continued population growth is in keeping with some neighbouring boroughs, with the population of Tower Hamlets having increased by 22.1% (highest growth in London) since 2011 and Barking and Dagenham’s population increasing by 17.7% (Census, 2021).
- 3.6.4 This growth explains 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, 89 in 2011 and 98 in 2021 people per hectare (ONS 2021, Demographic Projections). This is still below

the density of crowded inner boroughs like Islington, Camden or Kensington and Chelsea, or neighbouring boroughs such as Hackney or Tower Hamlets.

- 3.6.5 Newham is a transient borough, with over 15% of the population either moved in or out of the Borough in 2017. Newham is a relatively young borough, with 24.6% of the resident community under the age of 18 years (ONS 2018).
- 3.6.6 There has been an increase of 21.9% in people aged 65 years and over, an increase of 15.3% in people aged 15 to 64 years, and an increase of 7.1% in children aged under 15 years (Census, 2021).

### 3.7 Employment

- 3.7.1 Newham has had historically high unemployment – more than double the national average in 1991 (Census, 1991). In recent years, official unemployment figures fell faster than the London and national average (from 13.1% in 2010 to around 10% in 2015), so that Newham was around the national average.
- 3.7.2 By June 2022, 83.6% of Newham’s employable males and 70% of employable females were in employment (Economy Newham, 2022). 88.5% of males and 63.1% of females who are employed are in full time employment, with the rest being in part-time employment (Economy Newham, 2022). 18.2 % of Newham’s 16-64 year olds are economically inactive, with the main three reasons being education (students), family reasons and long-term sickness issues (Economy Newham, 2022). The Covid-19 pandemic will have/continue to exacerbate the number of people on long-term sickness alongside increase the amount of people that are economically inactive. Only 7.5% of those who are economically inactive want a job (Economy Newham, 2022).
- 3.7.3 Underemployment is also an issue in Newham, particularly among part-time workers, with 1 in 5 residents (19%) wanting to work longer hours at their current rate of pay (NHPS, 2018). The number of part-time jobs rose from 23,000 in 2009, 28,300 in 2012 to 35,000 in 2019 (NOMIS).
- 3.7.4 22% of children lived in out-of-work families in 2016, compared to 35% in 2013 (HM Revenue and Customs, Tax Credits, 2016).
- 3.7.5 Since 2007, Newham’s job brokerage service, ‘Our Newham Work’ has helped over 40,000 residents into work. Half of the residents helped into work are long-term unemployed (Our Newham Work, 2021).

### 3.8 Benefits

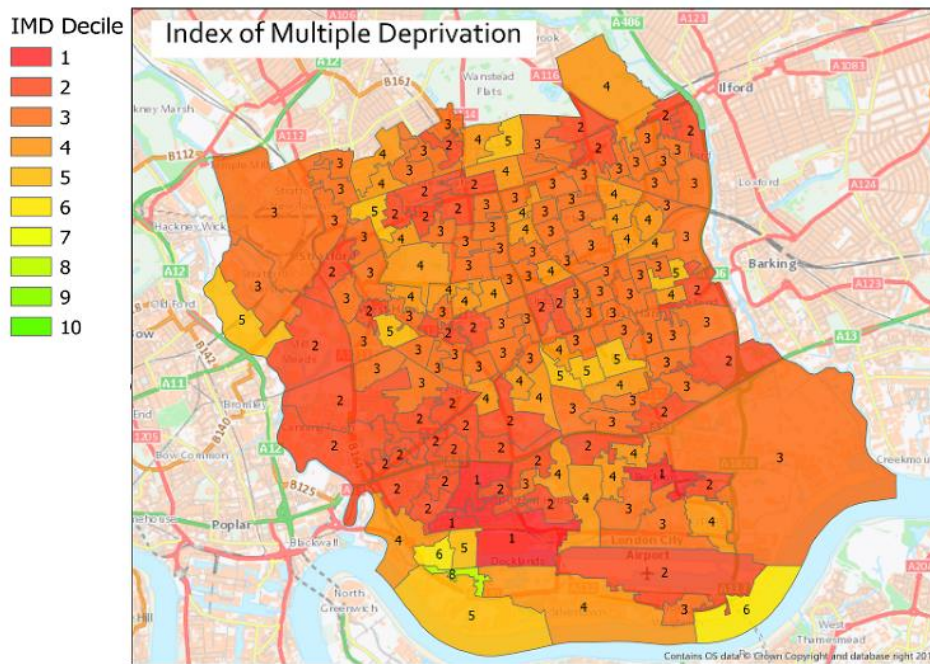
- 3.8.1 Covid-19 has exacerbated many of these employment issues, with Newham having the biggest increase in Universal Credit claimant rates at around 200% at the peak of the pandemic. In July 2020, 102,000 Newham residents were on furlough, or unemployment benefits – 35,000 more than neighbouring boroughs, Tower Hamlets and Hackney, and around the same as Kensington & Chelsea, Kingston upon Thames, Richmond, Westminster and the City of London combined.
- 3.8.2 Just over half (57%) of Newham residents receive some benefits (NHPS, 2018). The Universal Credit claimant rate was higher in Newham when compared to the London or England rates in 2020 (NOMIS). Newham’s rate of out of work benefits by September 2022 was 15,640 claimants, with 50,182 people on Universal Credit (16-65 year olds) (Economy Newham, 2022).

### 3.9 Levels of deprivation and poverty

- 3.9.1 Levels of deprivation in Newham have reduced in recent years – the borough was ranked the 2<sup>nd</sup> most deprived borough in 2010, the 8<sup>th</sup> most deprived in 2015, and the 12<sup>th</sup> of 317 local authority districts most deprived in 2019. However, the borough remains in the top ten local authorities in the country where multiple deprivation remains high (ONS 2018).
- 3.9.2 Four Newham wards are in the bottom 10% in London for overall quality of life (Forest Gate South, Custom House, Canning Town North and South). There are 4 Lower Super Output Areas with an Index of Multiple Deprivation of 1 – meaning they are in the worst 10% in the country (ONS 2019).
- 3.9.3 Education attainment is discussed in **Section 3.16**, though it is important to note that in spite of Newham’s deprivation issues, it scores well against the educational index of multiple deprivation.
- 3.9.4 67% of Newham’s children live in households in poverty after housing costs. (NHPS, 2018). 49% of households in Newham have incomes below the poverty threshold after housing costs. This is even higher than the national average (22%). (NHPS, 2018).

**Figure 3.1 Newham LSOAs mapped by decile**

Newham LSOAs mapped by decile



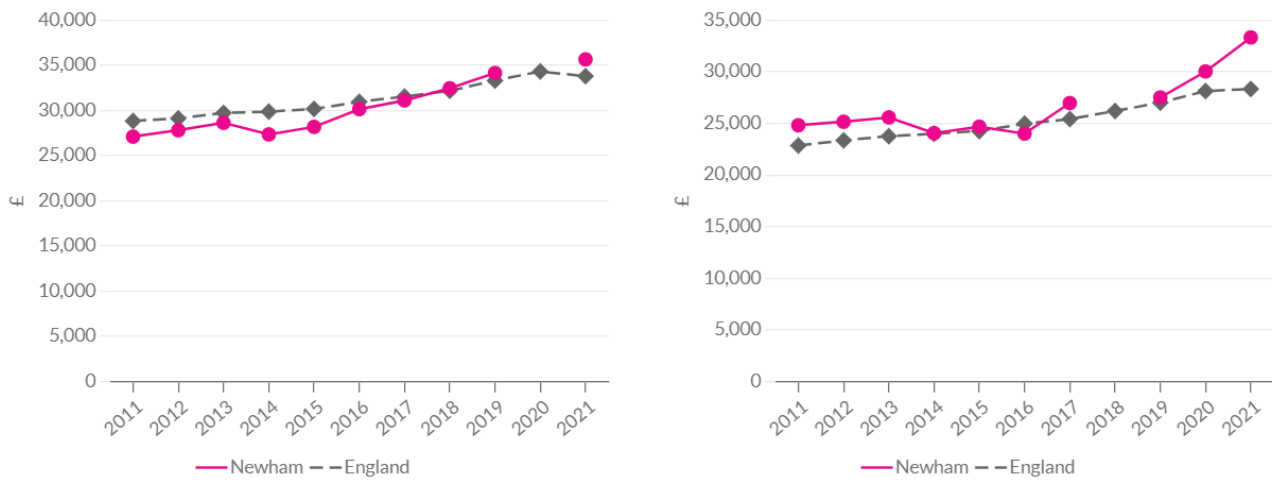
- 3.9.5 Poverty levels in Newham (as identified in **Figure 3.1**) are far in excess of national levels – taking housing costs into account increases the discrepancy still further due to the high cost of living in Newham. Absolute poverty levels have stagnated since 2013, with just under two-in-five households in Newham (39%) in absolute poverty before housing costs, compared to 44% in 2013. This far exceeded the national incidence of 16% in 2018 (NHPS 2018). As of 2020, 16,534 children under 16 living in families with Absolute Low Income existed, with 19,661 children under 16 living in families with Relative Low Income (Deprivation Newham, 2022).
- 3.9.6 39% of households in Newham are in poverty before housing costs. This is more than double the national figure (16%). (NHPS, 2018).



### 3.10 Household incomes and pay

- 3.10.1 Household incomes in Newham remain significantly below the national average. The median net equivalised household income before housing costs in Newham equates to £373 per week compared to the national level of £453 per week (NHPS 2018). This is exacerbated further by high housing costs meaning that median net equivalised household income after housing equates to £293 per week compared to £413 nationally (NHPS 2018). Although improvements to these figures have occurred in recent years, real term pay is still below the 2008-2009 recession peak (ONS 2019).
- 3.10.2 Jobs paying £30,000 or less are five times more at risk of computerisation than for top earners (ONS 2018).
- 3.10.3 Median pay has increased since 2015, however this is still far below the national average. (NHPS, July 2018). The gender pay gap in Newham has women earning 13% less than men in Newham, compared to the 9% national average. There is also a significant gender gap in employment levels, with working-age women more likely to be unemployed compared to working-age men (NOMIS).
- 3.10.4 There is also a Black and Minority Ethnic employment gap of 18.7% in Newham and a gender employment gap of 23.2% (ONS 2019). Newham's Household Panel Survey estimates that 27% of employees in the borough are paid less than the national Statutory Minimum Wage, suggesting that workers' rights abuses are high.
- 3.10.5 In 2018, 17% of residents said they were "comfortable"; 11% of residents are struggling to manage financially; and a quarter (25%) are just "getting by". This is a substantial improvement on 2011, where just 8% of residents said they were "comfortable", nearly a quarter of residents were struggling to manage financially, and a third of residents just "getting by" (NHPS, 2018).
- 3.10.6 **Figure 3.2** identifies the median annual pay for males and females within Newham (Economy Newham, 2022).
- 3.10.7 **Figure 3.3** highlights the average annual salary and number of job vacancies within Newham for the period of October 2021 to September 2022 (Adzuna Newham, 2022).

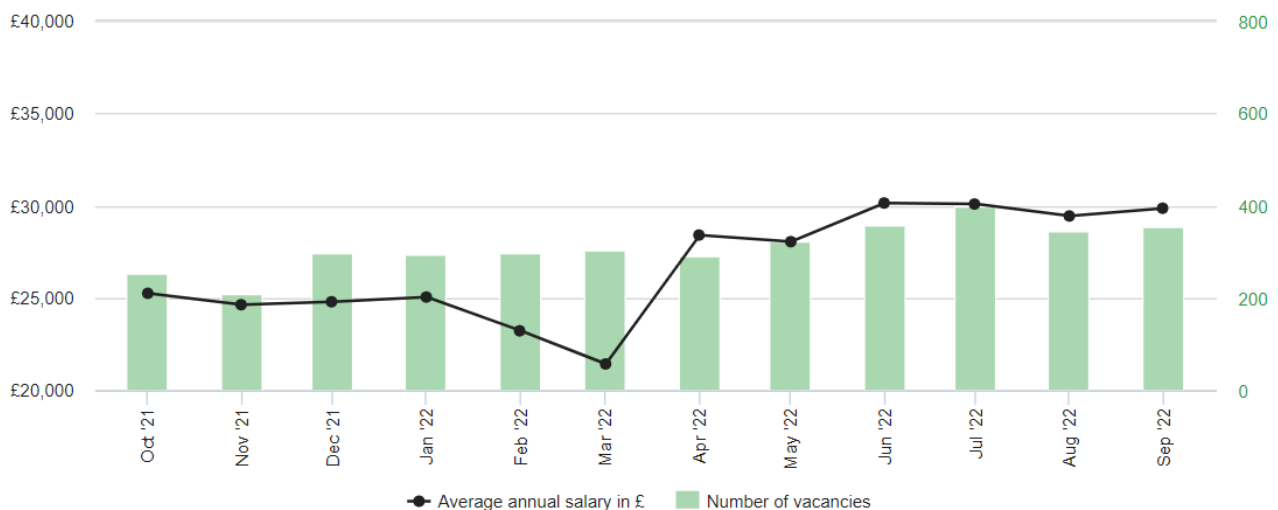
**Figure 3.2 Median annual pay for male and female full time workers (resident)<sup>1</sup>**



Source: ASHE

Source: ASHE

**Figure 3.3 Salary and vacancy trends in Newham**



### 3.11 Fuel poverty and debt

3.11.1 Newham has the highest rate of fuel poverty in England, with over one in five households affected (21.7%). (BEIS, 2021). More than one in ten households (14%) say they have fallen behind in paying bills in the last twelve months (NHPS, 2018).

3.11.2 Residents from black ethnic backgrounds are twice as likely to say their household has fallen behind with their bills (27%, compared with 13% of residents from an Asian ethnic background, and 10% of residents from a white ethnic background). (NHPS, 2018).

<sup>1</sup> Figures for earnings come from the Annual Survey of Hours and Earnings (ASHE). The ASHE is based on a 1 percent sample of employees, information on whose earnings and hours is obtained from employers. The survey does not cover self-employed. The earnings information collected relates to gross pay before tax, national insurance or other education, and excludes payments in kind. It is restricted to earnings relating to the survey pay period and so excludes payments of arrears from another period made during the survey period; any payments due as a result of a pay settlement but not yet paid at the time of the survey will also be excluded.



60,000 of our residents, approximately 22%, have been identified as having problem debts (MAS 2017).

- 3.11.3 Fuel poverty and general poverty within Newham will have escalated as the UK's continued cost of living crisis continued.

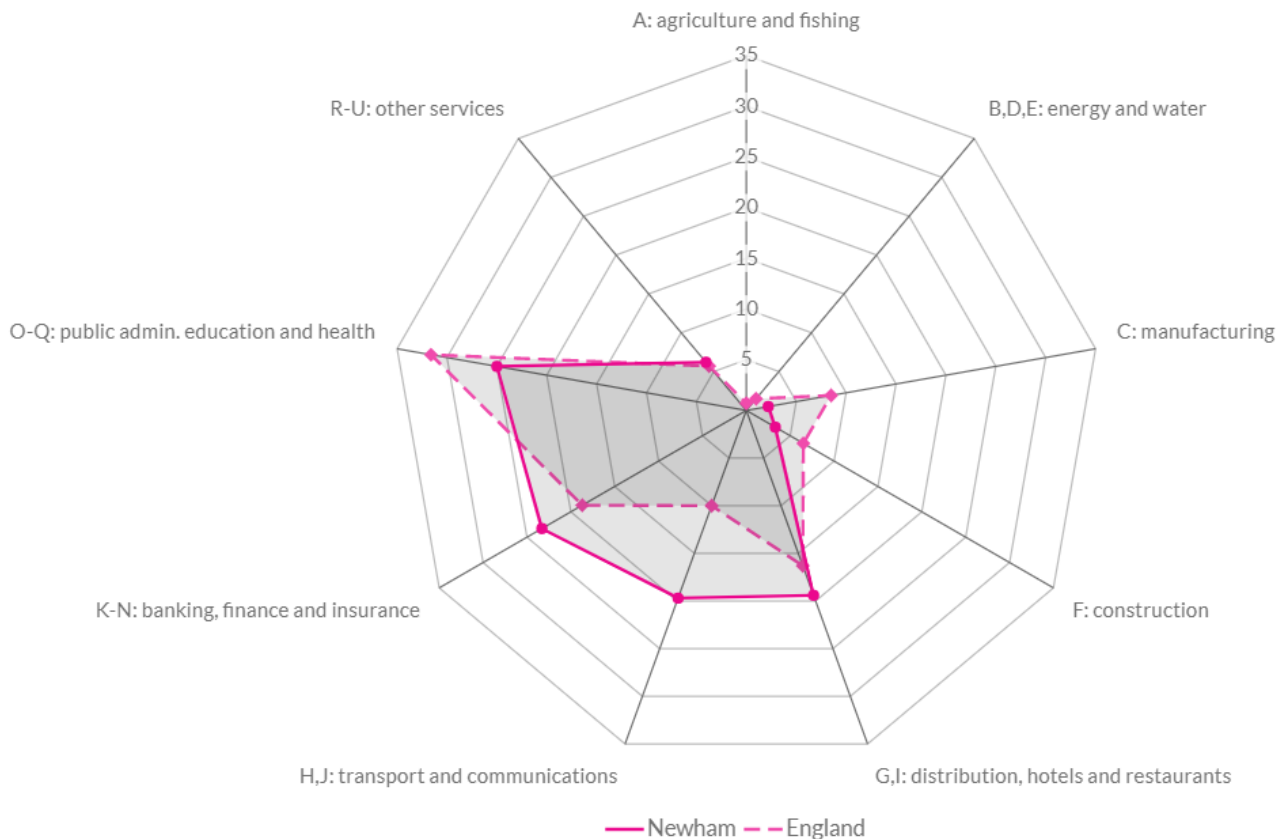
## 3.12 Businesses and town centres

- 3.12.1 Newham has approximately 14,000 businesses, with 94% of these businesses being micro sized enterprises employing nine or fewer staff.
- 3.12.2 Business growth has increased by 5,100 between 2015 and 2020 (78%), which is twice the rate of growth in London overall (31%). The highest growth has been in business support services. At 48%, Newham has a relatively low proportion of 'resilient' businesses compared with other areas and the figure for Inner London is 69%.
- 3.12.3 Newham has the benefit of lower rent for business workspace than the London average, but it is rapidly catching up with office rental values, increasing by 105% between 2013 and 2018, compared to the London average of 38% (GLA 2019).
- 3.12.4 Pre-pandemic, vacancy rates in Newham's town centres were below national average, around 7% in 2018 compared to the national average of 11% (Newham, Local Data Company).
- 3.12.5 As of 2020, Newham had 15,575 active enterprises, with 2,980 enterprises established within 2020 and 2,330 enterprises closing during 2020 (Economy Newham, 2022).

## 3.13 Jobs in Newham

- 3.13.1 Between 2013 and 2017, the number of jobs in Newham grew by 18,160 jobs (20%), almost twice the growth rate for London as a whole (11%) (GLA 2019). However, the proportion of jobs within knowledge-based activities is half that of London, and the proportion of high growth (scale up companies) in Newham is on fifth of the national average (ONS 2018). By 2020, there are 0.6 jobs for each Newham resident aged between 16-64, identifying that there is a shortfall of employment opportunities within Newham (Economy Newham, 2022).
- 3.13.2 Between 2013 and 2016, the Borough saw a 14% increase in overall job numbers, with retail (partly down to the opening of Westfield shopping centre) remaining the dominant sector and steadily growing year on year. **Figure 3.4** identifies the proportion of Newham's population in each employment industry as of June 2022 (Economy Newham, 2022).

**Figure 3.4 Percentage of employed by industry for Newham (2022-06)**



### 3.14 Housing

- 3.14.1 The suitability of housing is a dominant problem in Newham, and across London – with issues including access to housing, affordability of housing (both buying and renting) as well as quality of accommodation. The levels of poverty and low incomes in Newham make pressures on the poorest particularly acute.
- 3.14.2 The share of owner occupiers has fallen (43% in 2001; 29% in 2011) along with the share of social housing tenants (37% in 2001; 34% in 2011). But there has been a steep rise in private renting, more than doubling since 2001 from 17% to 37%. In 2011 there were 16,600 more private rented properties than in 2001, and the figure is rising.
- 3.14.3 Private rents have risen and private tenants have seen incomes after housing costs fall since 2009 (NHPS, 2014). In 2018, Median monthly rents in Newham were £650, up from £545 in 2015. In the private rented sector, the median monthly rent increased to £1,200 from £934 (NHPS, 2018). On average, private rents rose 56% in between 2012 and 2019.
- 3.14.4 Over the last 20 years, house prices in Newham have increased dramatically, from around £100k in 2001, £208k in 2011 and £388k in 2021 – increases far above inflation. Although these increases are large, house prices, remain far below the London average (£388,000 compared with £655,000). (HM Land Registry, 2021). The proportion of owner occupiers (29%) is far below the London average of 50%, and less than half the national average (64%).
- 3.14.5 Just less than half of Newham households report issues with their accommodation (49%), with most common problems including damp walls, floors or foundations and a lack of space. (NHPS, 2018). Those living in social rented accommodation are significantly more

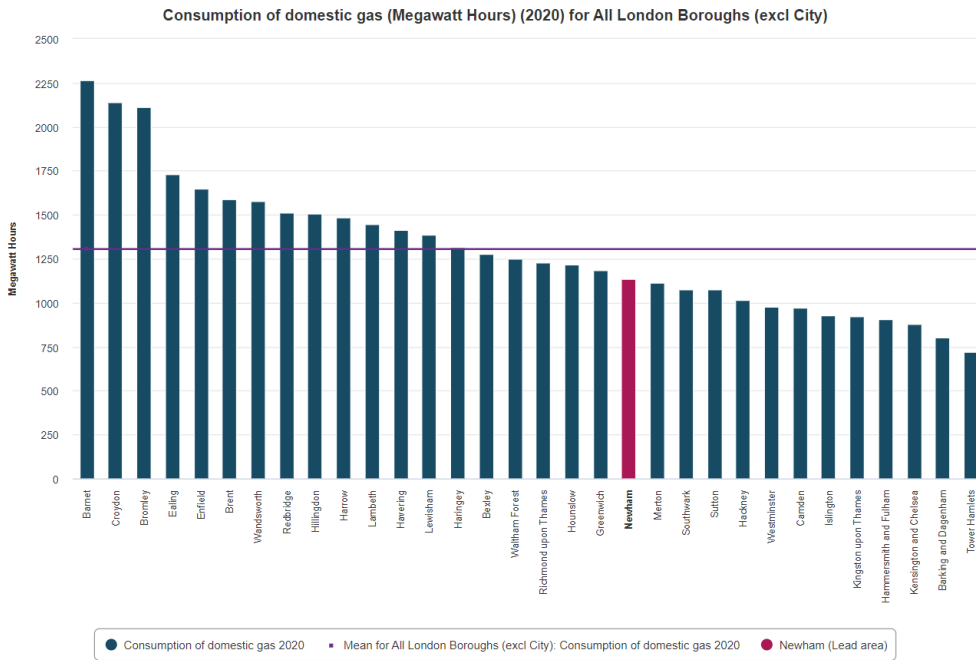
likely to report a wide range of issues with their accommodation than those living in other tenures – three in ten mention damp as an issue and a quarter cite lack of space (29% and 26% respectively (NHPS, 2018).

- 3.14.6 In 2021, 55% of dwellings in Newham were flats/maisonettes, with 41% being terraced housing, 2% being semi-detached houses and 1% being detached houses (Housing Newham, 2022). Newham's housing mix is a product of its location, with space being a premium and the only option to deliver development is to build upwards.

### 3.15 Energy Efficiency

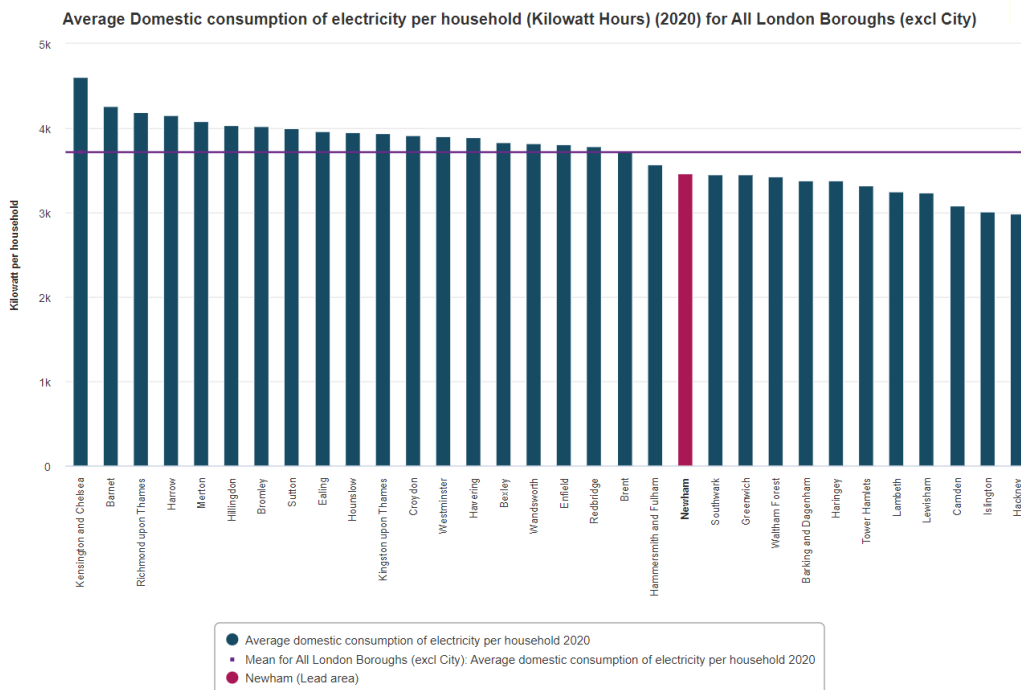
- 3.15.1 Energy Performance Certificates (EPC) are a standard measure of the overall efficiency of a home (A-G rating), and buildings must have an EPC when constructed, sold or let. Since 2012, the average EPC rating in Newham has improved from D to C, and the percentage of EPCs issued below Band E has steadily dropped from 9% to 1%. In April 2018, the Government tightened regulations requiring landlords to upgrade properties to at least EPC Band E.
- 3.15.2 Newham is currently running the ECO4 scheme, which seeks to provide support to those in low-incomes and vulnerable households to get energy efficiency and heating improvements to their homes (Newham ECO4, 2022). This is likely to aid in the improvement of some of the most energy and heat inefficient homes within Newham, whilst also protecting vulnerable people.
- 3.15.3 Newham residents, on average, are shown to use less gas and electricity than the average for London as a whole as shown by **Figure 3.5a** and **Figure 3.5b** in 2020. Of the 32 Local Authorities identified by these figures, Newham placed 20th for gas usage and 21st for electricity usage, highlighting that the borough benefits from a population that was not straining such important resources in 2020. It is likely that the current electricity and gas supply issues facing the UK would lead to an even lower consumption of gas and electricity in 2022.

**Figure 3.5a Consumption of domestic gas (Megawatt Hours) in Newham (2020)**



Source: Department for Business, Energy & Industrial Strategy

**Figure 3.5b Average Domestic consumption of electricity per household (Kilowatt Hours) in Newham (2020)**

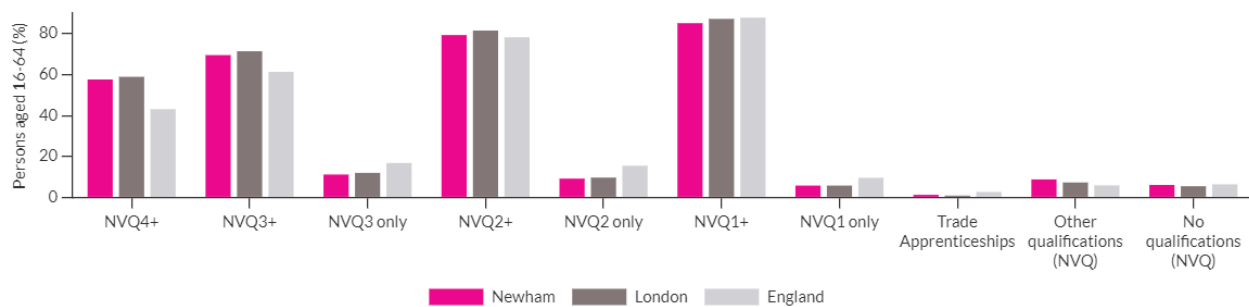


Source: Department for Business, Energy & Industrial Strategy

### 3.16 Education

- 3.16.1 Newham’s educational gains are the most striking achievement of the last decade. Young people in Newham are high achievers with 65.8% of pupils achieving a level 4 or above (equivalent to a grade C or better) in both English and Maths GCSEs in 2017-18 (compared with 64.2% for England).
- 3.16.2 In 2019, 76% of children within Newham achieved a good level of development at early years (Children & Newham, 2022). In 2019, 51.3% of GCSE students managed to achieve their attainment 8.
- 3.16.3 In Newham, 36% of schools and colleges are rated as ‘outstanding’ compared to 20% for England. There have been over 10,000 apprenticeship starts in Newham over the past five years, significantly higher than our neighbouring boroughs (UK Government 2019). Newham’s adult learning service engages with 8,000 part-time learners each year (LBN 2019).
- 3.16.4 However, just one in ten of Newham residents (11%) have a Higher Education qualification, compared with almost half of Londoners (47%) and over a third of people in the UK (36%) (NHPS 2018). Furthermore, over one in four (28%) of Newham residents have no formal qualifications, significantly more than the London (9%) or UK (12%) figures. In 2021, Newham had 280 male NEETs ages between 16 and 17 and 170 female ones (Children & Newham, 2022).
- 3.16.5 **Figure 3.6** identifies the qualifications (NVQ) levels held by people living within Newham within its working age population, therefore is inflated as people move to Newham to work and live in London and is not entirely reflective of Newham’s education system. This figure identifies that the population of Newham is well educated and has an excellent minimum level of education.

**Figure 3.6 Qualifications (NVQ)**



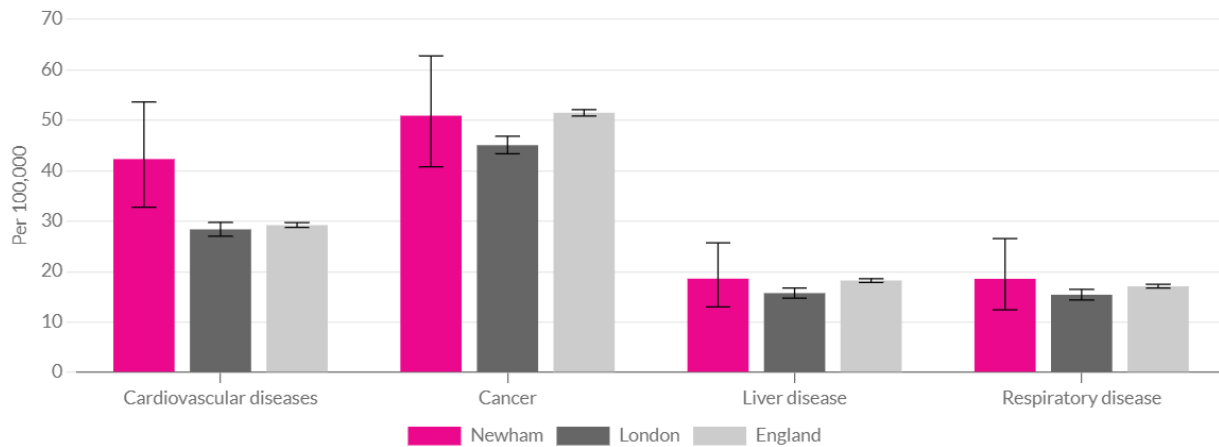
Date: 2021-12 Source: ONSAPS

### 3.17 Health of residents and air quality

- 3.17.1 With regard to the health of Newham residents, the proportion who are overweight has risen significantly: in 2018/19. 57% of Newham’s residents aged 18+ were classified as overweight or obese. This is higher than London (56%) and but smaller than England (62%).
- 3.17.2 In relation to a healthy diet, 28% of Newham residents in 2018 got their Five a Day of fruits and vegetables: an increase from 25% in 2015 (NHPS, 2018). This has improved to 48.5% in 2019 to 2020 (Health & Social Care Newham, 2022).

- 3.17.3 Between 2020 to 2021 the percentage of Newham’s children that were physically active was 31.4%, which was a lower rate of activity than that experienced within London (44.4%) and England (44.6%) as a whole (Health & Social Care Newham, 2022).
- 3.17.4 The percentage of Newham’s adult population that was physically active between 2019 to 2020 was 53%. During the same time period, 68.2% of Newham’s over 18 population was considered overweight or obese, rising considerably from the previous year (Health & Social Care Newham, 2022).
- 3.17.5 Newham men can expect to live to 58.4 years in good health and women to 61.4 years, compared with 64.2 and 64.4 for England in 2018 (PHE, 2018). **Figure 3.7** identifies the under 75 mortality rate from causes considered preventable in 2020 and shows that Newham has a higher rate of mortality in its four categories than London and England.

**Figure 3.7 Under 75 mortality rate from causes considered preventable (2020)**

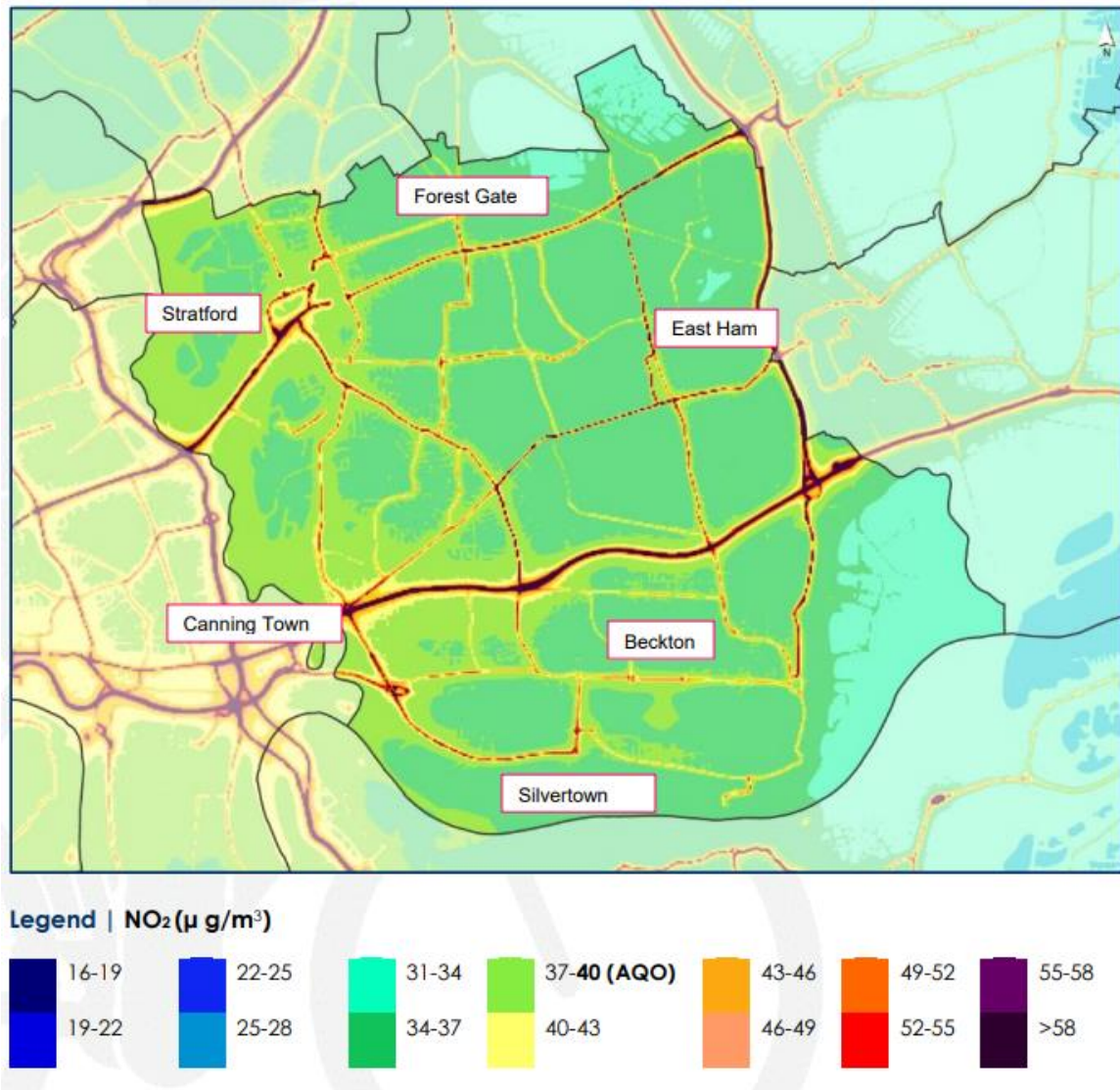


Date: 2020 Source: PHE

- 3.17.6 The premature death rate from cardiovascular disease is significantly worse for Newham compared to the rest of England (PHE 2019)
- 3.17.7 Fourteen percent of the Borough’s population is exposed to NO<sub>2</sub> levels above the air quality objective (AQO) for human health and on average all Newham residents are exposed to levels of PM<sub>2.5</sub> that is thirty five percent greater than the WHO guideline value of 10µg/m<sup>3</sup>. (AQAP, 2019) This causes the highest rate of deaths from pollution in England – amounting to 96 people dying prematurely each year (PHE 2019) The diagram below clearly shows that high levels of NO<sub>2</sub> correlate with the location of major roads in the borough (A13, A406 (North Circular), Barking Road and Romford Road). **Figure 3.8** shows the level of NO<sub>2</sub> in and across Newham. In 2019, 7% of all mortalities were related to air pollution issues (Health & Social Care Newham, 2022).



**Figure 3.8 NO<sub>2</sub> Levels within Newham**



3.17.8 Covid-19 disproportionately affected Newham and Newham’s residents that any other London Borough. At the height of the pandemic, the Covid-19 mortality rate in Newham (196 per 100,000) was the second highest in the country.

### 3.18 Crime

3.18.1 According to a survey of residents in the borough, crime levels in Newham are improving, with 12% of residents noting that they experienced crime in 2018 - a small reduction from 15% in 2015 (NHPS, 2018). 39% of residents felt unsafe at night - the lowest level since 2004 (NHPS, 2018). However, 78% of residents reported that at least one type of Anti-Social Behaviour was common in their local area.

3.18.2 Between September 2021 to August 2022, 35,503 crimes were committed within Newham, which is 101 crimes per 1,000 people (Crime & Community Safety Newham, 2022). The two most common crimes that were committed within this period were ‘violence and sexual offences’ (10,727 – 30 per 1,000 people) and ‘anti-social behaviour’ (10,378 – 29 per 1,000 people). During this time period, the crime rate within Newham has remained relatively consistent (8.2 per 1,000 people) and similar to the London average (8.1 per 1,000 people), both of which are starting to trend downward slightly.



### 3.19 Green and open space

3.19.1 Green space covers 15% of Newham, compared with 39% for London as a whole. Newham has 25 parks and numerous green spaces totalling approximately 396 ha of publicly accessible green space. The borough has 15% tree cover, the second lowest in London. Residents do enjoy and use parks and open spaces in Newham, with 43% of residents visiting at least once a week. In 2020, 18.8% of Newham’s population was able to utilise an outdoor space for exercise/health reasons (Environment Newham, 2022).

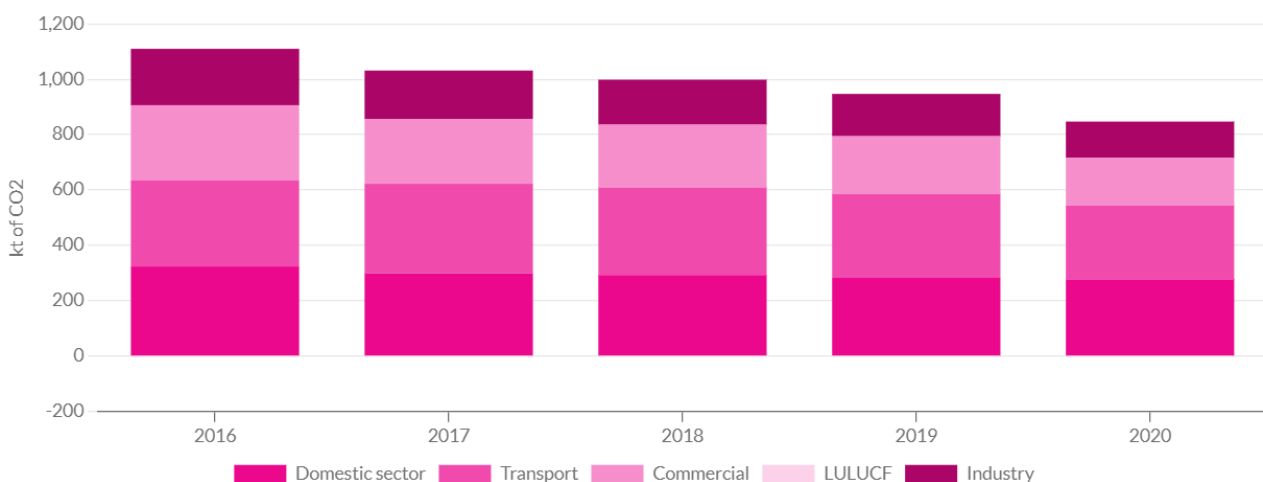
### 3.20 Water quality

3.20.1 Water quality in Newham’s three rivers – the Thames, Lea and Roding – has improved dramatically over the last 50 years, assisted by the decline in heavy industry - however data from the Environment Agency show that river quality has not improved in recent years.

### 3.21 Carbon emissions

3.21.1 The majority of carbon emissions in Newham come from Industry and Commercial activity, in particular industry and commercial electricity. CO<sub>2</sub> emissions in all sectors have fallen since 2012, with the largest reductions in the Industrial and Commercial sector. The carbon emissions per capita have dropped substantially since 2012, however in recent years these figures have plateaued to 22.8 kt of CO<sub>2</sub> per km<sup>2</sup> in 2020 (BEIS, 2021). This is equivalent to 2.5 tCO<sub>2e</sub> per person in Newham in 2020 (BEIS, 2021) and compares to London figure of 3.2 tCO<sub>2e</sub> per capita. London has the lowest emissions per capita of any region due to the urban nature of the transport system, a high population density and its lower level of large industrial facilities than other regions (BEIS 2022). Carbon emissions within Newham’s industry sector has been falling considerably year on year, with small declines in the amount of carbon emissions its commercial sector produces (BEIS, 2021), as shown by **Figure 3.9**.

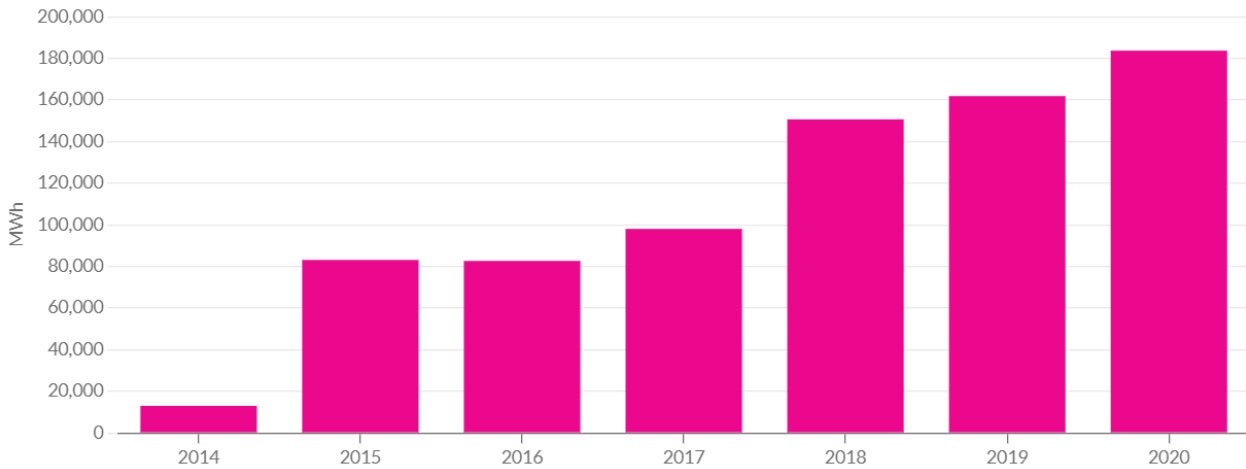
**Figure 3.9 Carbon emissions by sector in Newham**



Source: BEIS

3.21.2 Despite the make-up of Newham’s built environment, it has still managed to improve the amount of energy it produced by renewable means each year between 2014 to 2020, as identified by **Figure 3.10**.

**Figure 3.10 Total electricity generated by renewable technologies in Newham**

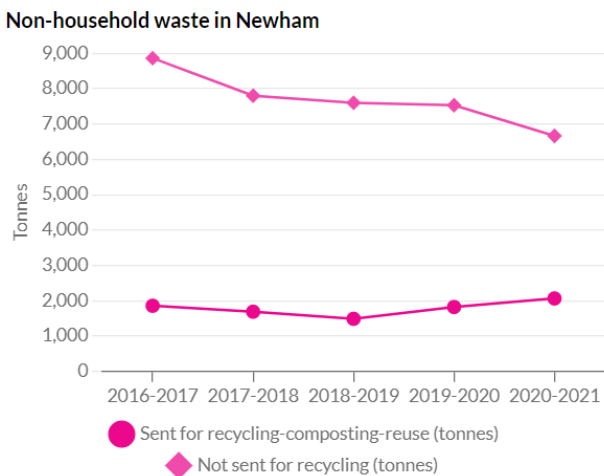


Source: BEIS

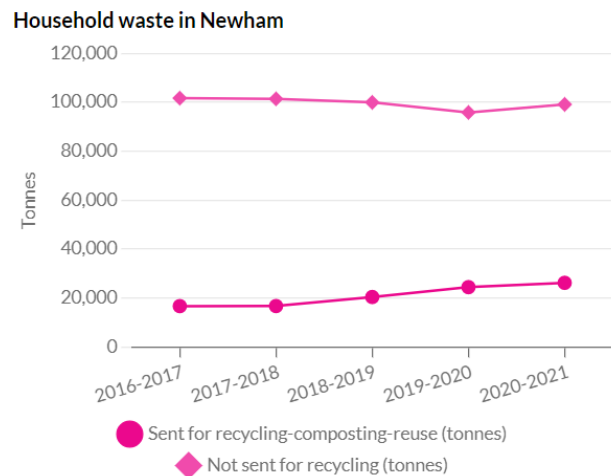
### 3.22 Waste and recycling

3.22.1 With regards to waste and recycling, Newham currently has the lowest recycling rate in England with 17% of the Council’s waste being recycled in 2018/19. The average recycling rate in England in 2018/19 was 45.1%. Waste collected per head in Newham was below the national average at 341kg per head in 2018-2019 (ELWA 2018/19). In 2020-2021, the total amount of waste within Newham not sent for recycling was 105,773 tonnes, with 28,241 tonnes sent for recycling (Environment, Newham 2022). The combined **Figure 3.11** identifies the total amount of non-household and household waste within Newham that was recycled or not recycled from 2016 to 2021. It also identifies that whilst Newham continues to struggle with its households and non-households not recycling, recycling rates are on a small upward trend.

**Figure 3.11 Non-household waste and household waste within Newham and recycling rates 2016 to 2021**



Source: DEFRA



Source: DEFRA

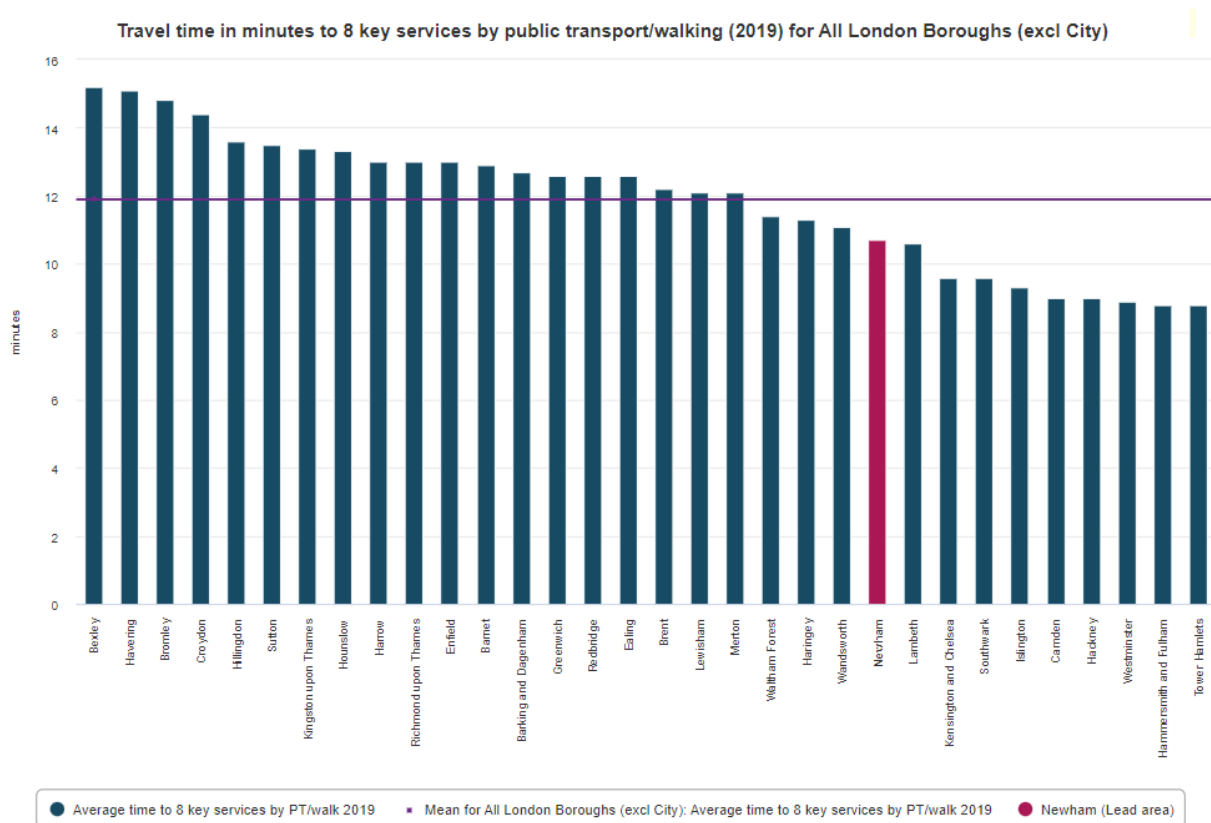
### 3.23 Water use

- 3.23.1 Water efficiency data is only available at a Thames Water (supplier to Newham) level. There have been steady improvements in the amount of water used per person per day (measured in litres/head/day), with Thames Water's 2014 Water Resources Management Plan (WRMP14) showing that the region consumed water per capita above the national average of 147 l/h/d. By 2017-18, this had improved to a low of 144 l/h/d. Thames Water's WRMP 2019 continued to identify that London consumed water per capita above the national average and continues to identify that the gap between London's water supply and consumption continues to worsen. The London Plan 2021 establishes a target of 105 litres or less per head per day consumed within London to try and address London's long-term water supply issues.

### 3.24 Transport

- 3.24.1 Newham has the highest public transport mode share at almost 41 per cent, almost 6 percentage points higher than the inner London average. However, cycling modal share in Newham is poor, around 2-3% - and in recent years, the reduction in car use has plateaued. Newham has the fourth lowest car ownership rate per head in UK - 52% of households do not own a car (TfL Travel in London 13, 2020).
- 3.24.2 Newham benefits from the minimum journey time to 8 key services by public transport or walking being 10.7 minutes as identified by **Figure 3.12**. **Figure 3.12** also shows Newham's services are considerably more accessible by public transport/walking when compared with the London Authorities.

**Figure 3.12 Travel time in minutes to 8 key services by public transport/walking in Newham (2019)**



Source: Department for Transport

- 3.24.3 There is a net daily outflow of 30,000 workers (predominantly westward to central London). Of the 28 TfL stations in Newham, only 4 stations lack step free access. This is one of the highest levels of public transport accessibility in London.
- 3.24.4 As of October 2022, TfL network public transport passenger numbers are at 82% of pre-pandemic levels in London, whereas car, van and heavy goods vehicle use in London has returned to pre-pandemic levels (TfL 2022).

### 3.25 Heritage and Archaeology

- 3.25.1 The borough has over 100 listed buildings with national historical or architectural interest. 4 are listed at Grade I, 5 at Grade II\* and 113 at Grade II. The borough has two national scheduled monuments, as well as 5 areas designated as Tier 1 Archaeological Priority Areas due to their archaeological significance. The borough has 9 Conservation Areas, with 1 located in the LLDC area.
- 3.25.2 The borough also has non-designated heritage assets - 192 locally listed buildings and 9 Areas of Townscape Value.

### 3.26 Contaminated land

- 3.26.1 Heavy industry in the form of gasworks, chemical works, tanneries, dye works, paint works, colour works, distilleries, railways and docks, combined with domestic refuse tipping, has

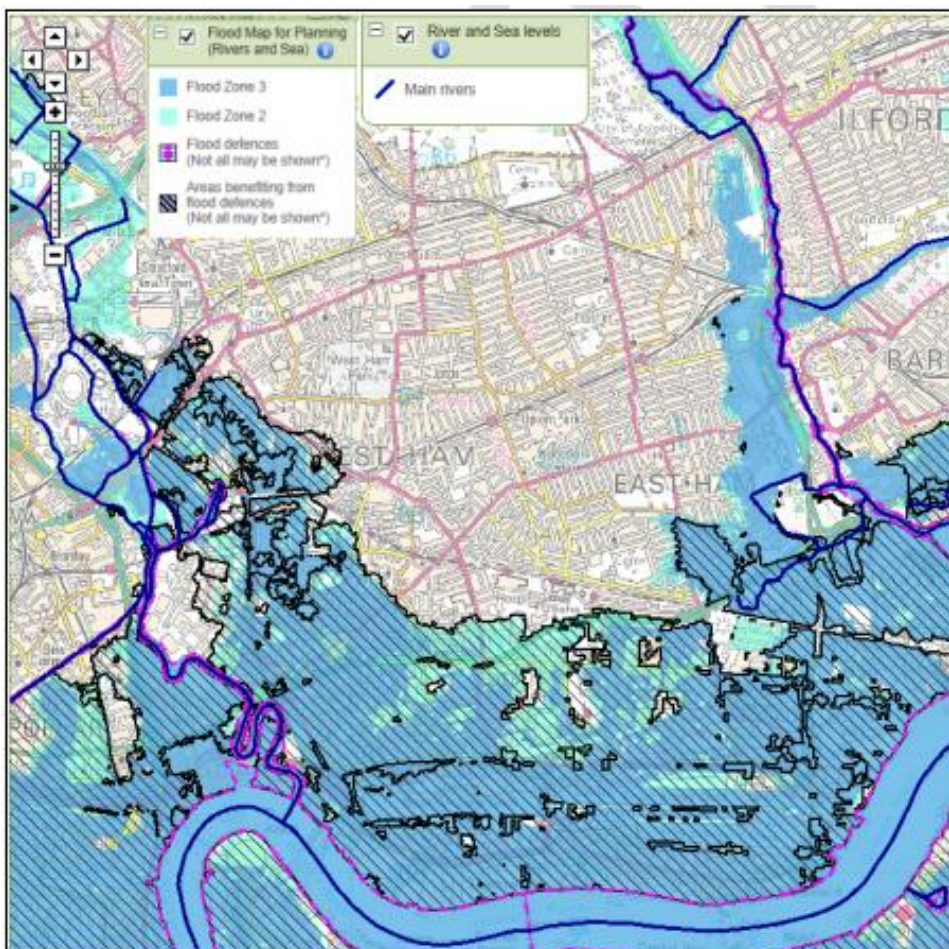
left Newham with a legacy of land and water pollution. The majority of this affected land, and associated groundwater, is located adjacent to the River Lea Valley and south of the A13. Over the last 40 years, as development has occurred in the Lower Lea Valley, Royal Docks and Beckton, many sites have been remediated or capped. However, the legacy of historical industrial use remains in many parts of the borough, notably in Beckton Riverside and the Royal Docks (LBN Contaminated Land Strategy, 2003).

### 3.27 Flood Risk

3.27.1 Newham is surrounded on three sides by London's three largest rivers, the Lea, the Roding and the Thames. Thanks to formal flood defences (including the Thames Barrier) all properties in the borough are protected from tidal and fluvial flooding. However, if no defences existed (or defences were breached) large areas of the borough are in Flood Zone 3. It is important to recognise that this flood risk is a residual risk, should flood defences fail.

3.27.2 **Figure 3.13** shows the areas of the borough within Flood Zones 2 and 3.

**Figure 3.13 Newham Flood Risk**



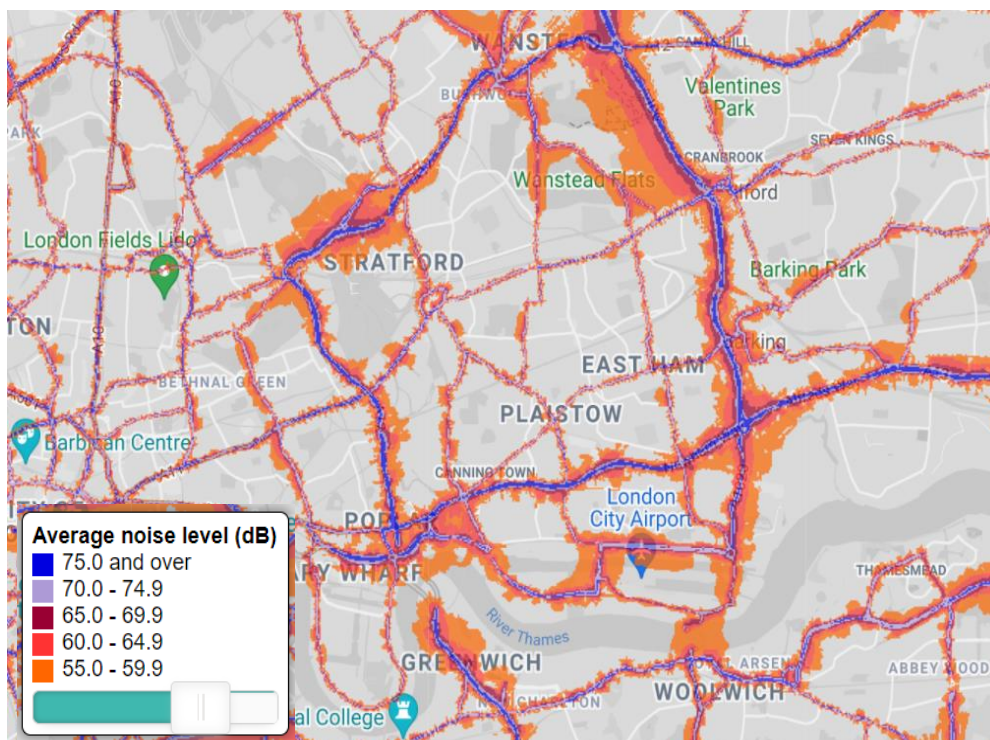
3.27.3 Potential risk of flooding from other sources exists throughout the borough, including sewer discharge and surface water flooding due to heavy rainfall & limited capacity of drainage infrastructure. 13 surface water 'flood risk hotspots' were identified in the Surface Water Management Plan.



### 3.28 Noise

- 3.28.1 Large areas of the borough are affected by noise (highlighted in **Figure 3.14**), notably from major roads such as the A13 and A406 (North Circular), and London City Airport. According to London City Airport data, all dwellings or noise sensitive buildings within relevant noise contours have installed or been offered to install sound insulation or improved windows. The map, taken from 2017 DEFRA noise data shows the average noise level from road noise in decibels across the borough.

**Figure 3.11 Noise levels within Newham**



- 3.28.2 Many of Newham's open spaces are also entirely or partially compromised by experiencing high levels of noise (Traffic noise maps of public parks in Newham, 2018). In 2021, 13.3% of Newham's population experienced some form of road, rail and air transport noise pollution during the night-time (Environment Newham, 2022).

### 3.29 Evolution of the Baseline Without and Update to the Local Plan

- 3.29.1 **Sections 3.4 to 3.28** of this report identify the baseline for Newham. It is important to note that the London Plan 2021 and the NPPF would continue to operate as important planning considerations and would aid in guiding development and the evolution of the baseline and Newham even without an updated Local Plan.
- 3.29.2 The main ways in which the baseline would evolve without an updated Local Plan are identified below:
- The population of Newham will continue to grow with or without an updated Local Plan. However, an updated Local Plan would be able to manage and address the needs of this continued growing population better than National and London policies,



e.g. by providing more detailed policy in relation to the location of growth and infrastructure requirements. Such population growth will also continue to place strain on existing and future services and facilities (educational, leisure, cultural and open spaces).

- Newham currently experiences high levels of deprivation and without an updated Local Plan, opportunities might be lost to help better improve areas of deprivation. The London Plan 2021 and National policies would not be able to provide the local policies that could provide targeted regeneration and masterplanning needed to address Newham's continued deprivation issues.
- Fuel poverty is a considerable issue within Newham, especially given the UK's cost of living crisis. Whilst an updated Local Plan could not provide immediate relief, it could help to mitigate fuel poverty in the future by providing energy efficient homes and encouraging alternate heating and energy generating sources.
- Employment opportunities could be lost without an updated Local Plan and Newham might continue to experience higher levels of unemployment and benefit claiming than other Boroughs, opportunities to retrain might be more limited.
- Business formation and expansion might continue within Newham without an updated Local Plan. However, an updated Local Plan could aid in supporting new business growth and enhance existing businesses by identifying land for employment/economic activities and safeguarding existing areas of employment use.
- Employment within Newham is dominated by educational, health, admin, banking/finance, transportation and hotel/restraint industries. This would likely continue to be the case without an updated Local Plan. However, a new Plan is able to encourage the growth of other sectors, including the green economy.
- Newham continues to experience a daily net outflow of 30,000 workers. This trend would likely continue, though an updated Local Plan could attract more employment opportunities to Newham, helping to provide residents with more choice in relation to where they work.
- Newham has a lack of affordable housing, with home ownership falling and the number of residents having to rent continuing to increase. It also struggles from a lack of housing variety and these issues would likely continue to increase in the future. An updated Local Plan would be able to aid in providing more housing (especially affordable housing) within Newham. The Local Plan could also help ensure a better housing mix and provide the local policy framework for managing the provision of student accommodation and other housing.
- Newham's residents experience poor air quality and health issues, these two elements having considerable interplay. Air quality within Newham contributes towards a large number of deaths each year and Newham's population is generally unhealthy and does not get enough physical activity. The ability to undertake physical activity in an area with poor air quality is difficult. Without an updated Local Plan, such physical health issues will continue to be exacerbated, whilst a new Local Plan would be better positioned to tackle air quality issues, encourage air quality neutral or positive development and encourage more active (healthy) lifestyles. Air quality associated with major roads will be harder for the Local Plan to influence.
- Crime rates are affected by many different elements, only some of which an updated Local Plan would be able to aid in addressing. An updated Local Plan could aid in providing economic opportunities, housing and a better, safer built environment that discourages anti-social behaviour (second most common crime in Newham).

- Newham experiences a deficiency in available green spaces and tree cover, which would be exacerbated without an updated Local Plan. An updated, Local Plan would be able to identify where green spaces should be located and secure their provision as part of new developments.
- Newham experiences reasonable level of water quality, with the rivers running through it experiencing a continued improvement to their water quality. However, such improvements to local rivers have slowed in recent years, and an updated Local Plan could help secure improvements to these rivers, as well as protecting and enhancing their character, setting and quality.
- Through national requirements and Newham's own initiatives (ECO4), energy and heat efficiency within Newham's built environment would continue to improve, especially as the need for energy efficiency savings becomes more important as energy supplies are stretched. However, an updated Local Plan would provide further support through policies to ensure new developments and old developments are energy and heat efficient.
- Newham experiences high levels of carbon emissions. Without an updated Local Plan, development would continue within Newham as directed by National policy and the London Plan 2021 (although the London Plan places great emphasis on reducing carbon emissions, the draft Local Plan proposes a more stringent approach in relation to the reduction of carbon emissions). An updated Local Plan provides the opportunity to require development to meet more challenging targets in relation to climate change mitigation. An updated Local Plan also provides the opportunity to encourage and enable employment in related sectors as part of the local supply chain.
- Newham has low recycling rates in relation to waste, though its recycling rate is starting to improve slightly. Without an updated Local Plan, this small upward trend in recycling could be slowed or even reversed, whilst an updated Local Plan could aid in encouraging this trend by helping to ensure that developments make adequate arrangements for the management of resources. The Joint Waste Local Plan is also being updated and would contribute to evolution of the baseline.
- London has a long-term water supply issue, which Newham also experiences. Without an updated Local Plan, the requirements of the London Plan 2021 would ensure measures to reduce water consumption are pursued, but an updated Local Plan would provide further impetus at the local level. Thames Water offers financial incentives to developers that achieve evidenced water efficiency measures and it is assumed that these would continue in the absence of the Local Plan.
- There are many heritage assets within Newham that are important to its local character, sense of place and communities, alongside their historical importance to London as a whole. The NPPF and London Plan 2021 would continue to protect such assets, though an updated Local Plan would be better positioned to provide protection to important designated and non-designated heritage assets. It would also potentially be able to ensure heritage buildings are brought back into use through targeted regeneration/masterplanning.
- Heavy industry in the form of gasworks, chemical works, tanneries, dye works, paint works, colour works, distilleries, railways and docks, combined with domestic refuse tipping, has left Newham with a legacy of land and water pollution, especially adjacent to the River Lea. The process of addressing this legacy would likely continue in the absence of the Local Plan but an updated Local Plan would be able to further allocate sites with contaminated land for restoration associated with development and provide the policy context for other sites to come forward.

- There are parts of Newham that are at risk of flooding (within Flood Zones 2 or 3) and Newham is bordered by three rivers. Increased flood risk is one of the main outcomes of continued climate change, which will also cause disturbances with the flow and levels of the rivers bordering and within Newham. A new Local Plan would be better able to stress the importance of addressing flood risk concerns and improving Newham's resilience to flooding.
- Due to its location, Newham experiences high levels of noise, especially along its roads and highways and due to it containing the London City Airport. Without an updated Local Plan, such noise issues would continue and likely grow, whilst an updated Local Plan could potentially better aid and target key areas of noise pollution and implement developments and methods that reduce noise pollution within such areas and Newham as a whole.

### 3.30 Key Sustainability Issues

1.9.1 From the review of the relevant plans and programmes (set out in **Appendix C**) and the baseline analysis (set out in detail in **Section 3**), a number of key sustainability issues affecting the borough have been identified and listed in **Table 3.1**.

**Table 3.1 Identified Key Sustainability Issues**

Identified Key Sustainability Issues
1. Concerns regarding the future of town centres following the COVID-19 pandemic
2. The mixed quality of local neighbourhoods and town centres
3. Lack of facilities and opportunities for young people
4. High levels of deprivation in some parts of the borough
5. Levels of crime and fear of crime
6. Poor levels of health and wellbeing, high levels of health inequality
7. Lower number of conservation areas and listed buildings when compared to neighbouring boroughs
8. High levels of residents claiming Universal Credit during the COVID-19 pandemic
9. Household incomes significantly below the national average
10. Wish to encourage continued growth of local businesses and jobs, attracting inward investment
11. Low proportion of resilient businesses
12. Retaining economic benefits in the borough
13. Maintaining improvement in education levels, childcare, education and training facilities
14. Poor quality of housing accommodation in the borough
15. High cost of renting and purchasing housing in the borough

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## Identified Key Sustainability Issues

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16. High levels of homelessness
  17. Insufficient quantity of housing delivered in the borough
  18. Low levels of energy efficiency of housing in the borough Serious implications from the Climate Emergency – mitigation and adaption measures to respond to impacts are required
  19. High levels of fuel poverty
  20. Poor recycling rate
  21. Continued flood risk from rivers and surface water
  22. Very high levels of poor air quality
  23. Legacy of contaminated land throughout the borough
  24. Open space deficiencies – lack of access to green space
  25. Low level of tree coverage
  26. Poor quality existing green & blue infrastructure and open spaces.
  27. Low levels of biodiversity, habitats and species in the borough
  28. Barriers throughout the borough due to roads, railways, rivers and urban grain
  29. Walking and cycling modal share is low compared to other boroughs
  30. Not all stations in the borough are accessible
  31. Low levels of waste reused, recycled or reclaimed, and high levels of waste sent to landfill
  32. Large areas of the borough affected by noise from roads and London City Airport
-

## 4. Approach to the IIA

### 4.1 Overview

4.1.1 This section describes the proposed approach to the IIA of the Local Plan. In particular, it draws on the information contained in **Sections 2** and **Section 3** to present the assessment framework (the IIA Framework) and sets out how this IIA Framework has been used to complete the assessment of the key components of the Local Plan (including reasonable alternatives). The section also outlines how the HIA, EqlA and HRA have been undertaken.

### 4.2 IIA Framework

4.2.1 **Table 4.1** sets out the IIA objectives and the full Framework is provided in **Appendix D**. These were consulted on by the Council as part of the Scoping Report between October and December 2021. The previous Local Plan SA scoping report proposed 13 sustainability objectives. These objectives were reviewed, assessing them against the baseline information and a peer review, undertaken by the Council, of what other recent local authorities have used as objectives. The Scoping Report included an exercise identify where potential conflicts may arise (see Table 6 of the Scoping Report). 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).

4.2.2 Each of the objectives has been linked to the monitoring framework set out in the Local Plan, which contains a comprehensive set of indicators to be examined through the Authority Monitoring Report Bulletins. As the Local Plan Review is progressed, the IIA will appraise policy options and site allocations against these objectives. In order to keep references to the IIA Objectives consistent, references to them individually and specifically within this report are as identified in **Table 4.2**.

**Table 4.1 Sustainability Objectives**

Sustainability Objective	Shorthand
SO1: Promote diverse and economically thriving town centres.	SO1: Town Centres
SO2: Ensure that neighbourhoods are liveable, safe, high quality with good accessibility to retail, leisure, culture, healthcare, education and open space.	SO2: Neighbourhoods
SO3: Maintain local distinctiveness and protect and enhance place-making assets.	SO3: Place-making
SO4: Encourage growth of local businesses, attract inward investment and increase employment	SO4: Employment

<b>Sustainability Objective</b>	<b>Shorthand</b>
<b>SO5: Ensure that economic benefits are retained within the borough following Community Wealth Building principles</b>	SO5: Economic benefits
<b>SO6: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.</b>	SO6: Education
<b>SO7: Improve the existing housing stock in the borough</b>	SO7: Housing stock
<b>SO8: Increase the supply of housing, choice and quality of affordable housing in the borough</b>	SO8: Housing supply
<b>SO9: Ensure the Local Plan incorporates mitigation and adaptation measures to reduce and respond to the impacts of climate change.</b>	SO9: Climate change
<b>SO10: Ensuring high standards of sustainable design are achieved in the built environment.</b>	SO10: Sustainable design
<b>SO11: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.</b>	SO11: Natural resources
<b>SO12: Avoid, reduce and manage all forms of flood risk</b>	SO12: Flood risk
<b>SO13: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.</b>	SO13: Land quality
<b>SO14: Address existing open space deficiencies and improving existing green &amp; blue infrastructure and open spaces.</b>	SO14; GBI
<b>SO15: Protect, enhance and increase biodiversity, habitats and species in the borough</b>	SO15: Biodiversity
<b>SO16: Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road.</b>	SO16: Sustainable transport
<b>SO17: Reduce amount of waste sent to landfill and increase reuse, recycling, and recovery.</b>	SO17: Waste
<b>SO18: Provide quality community facilities and infrastructure in the right location for residents.</b>	SO18: Community facilities
<b>SO19: Encourage greater community cohesion and reduce poverty, Racism, Inequality and Disproportionality.</b>	SO19: Inclusion
<b>SO20: Improve and increase the facilities and opportunities for young people.</b>	SO20: Young people
<b>SO21: Contribute towards reducing crime and the fear of crime.</b>	SO21: Crime
<b>SO22: Improve the health and wellbeing of the population and reduce health inequalities.</b>	SO22: Health and wellbeing



4.2.3 **Table 4.2** shows the extent to which the IIA objectives encompass the range of issues identified in the SEA regulations.

**Table 4.2 Coverage of the SEA Regulation Topics by the IIA Objectives**

SEA Regulation Topic	IIA Objectives
Material Assets	11, 13, 17
Climatic Factors	9, 10, 17
Biodiversity	10, 13, 14, 15
Fauna	10, 13, 14, 15
Flora	10, 13, 14, 15
Water	10, 12
Soil	3, 10, 11, 13 17
Air	3, 9, 10, 11, 17
Cultural heritage, architectural and archaeological heritage	2, 3, 10,
Landscape	3, 10, 11, 13, 15
Population	2, 4, 5, 6, 7, 8, 9, 18, 19, 20, 21, 22
Human health	2, 9, 10, 14, 21,22

## 4.3 Methodology

4.3.1 Based on the scope of the Local Plan detailed in Section 1, the IIA Framework has been used to appraise the following key components of the Plan (and reasonable alternatives where these exist):

- Vision and objectives;
- Spatial strategy;
- Approach to planning for neighbourhoods;
- Quantum of Employment Land for Industrial Uses Policies (including policy options that need to be treated as reasonable alternatives);
- Thematic policies, including consideration of reasonable alternatives; and
- Site allocations and any reasonable alternatives for the use of sites.

4.3.2 The approach to the appraisal of each of the above Plan components is set out in the sections that follow.

## Consideration of Reasonable Alternatives

4.3.3 As summarised in the PPG:

*“The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves...”* (Paragraph: 018 Reference ID: 11-018-20140306)

4.3.4 Typically, for a Local Plan, reasonable alternatives will include options regarding the amount of growth, the spatial strategy, individual site allocations as well as the policies to manage and plan positively for growth.

4.3.5 The potential to consider reasonable alternatives is, however, limited by the London Plan with which the Local Plan must be in conformity. The London Plan 2021 identifies the need for the Local Plan to deliver at least 47,600 additional homes in Newham over the period 2019/20 to 2028/29. This includes an allowance for housing development on small sites.

4.3.6 Policy H1 of the London Plan 2021 states that to ensure housing targets are achieved, boroughs should:

- *“optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:*
  - ▶ *a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station<sup>2</sup> or town centre boundary<sup>3</sup>;*
  - ▶ *b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets;*
  - ▶ *c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses;*
  - ▶ *d) the redevelopment of surplus utilities and public sector owned sites;*
  - ▶ *e) small sites (see Policy H2 Small sites); and*
  - ▶ *f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support.”*

4.3.7 In consequence, as the London Plan 2021 includes an annual housing target for the borough the SA has not considered reasonable alternatives for the scale, broad locations and planning policy associated with housing provision. This approach is corroborated by the Inspectors Report on the Local Plan for the London Borough of Hounslow 31st July 2015), which states:

*“London has a two-tier planning system in which the London Plan and the Local Plan are both part of the Development Plan. The London Plan sets out the broad strategy for the city as well as some more detailed provisions. It includes key policy requirements and the Local Plan is required to be in general conformity with it. This limits the scope for the consideration of alternative strategies on matters such as: the supply of housing (for which the London Plan sets a target for the Borough); the location of employment (for which the London Plan identifies some locations and employment types to be provided or protected); and the hierarchy of town centres...”*

<sup>2</sup> Tube, rail, DLR and tram stations

<sup>3</sup> District, major, metropolitan and international town centres – for the purposes of Policy H1 Increasing housing supply Part B2a, the 800m distance is measured from the edge of the town centre boundary.

4.3.8 Para 39 then states:

*“For these reasons the preparation of the Local Plan and the requisite sustainability appraisal explicitly only explored policy options where the opportunity for proposing reasonable alternatives to national and regional policy existed, whether to meet local objectives or to respond to local distinctiveness.”*

4.3.9 Whilst the scale of housing development is established, there are options in terms of how the Local Plan distributes growth within the borough and how much land is provided for industrial uses. The approach to reasonable alternatives is discussed in this section.

## Spatial Strategy

4.3.10 The Council has some discretion in terms of how it accommodates growth within the borough and has considered the merits of maintaining the strategy set out in the Adopted Local Plan.

4.3.11 The Council identified four reasonable alternatives:

- Directing significant levels of growth to neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area, neighbourhoods along the River Lea which form part of the cross boundary Poplar Riverside Opportunity Area and to the Stratford and Maryland neighbourhood, supported by a redesigned Stratford Station, with incremental character-led intensification and change in other neighbourhoods. All 16 neighbourhoods to experience some degree of change, influenced by individual policies informed by the specific needs of that neighbourhood.
- Retain the Arc of Opportunity and Urban Newham. Arc of Opportunity is focus of job creation, infrastructure development, new town and local centres and vast majority of new housing. In Urban Newham there is incremental and small change focussed in town and local centres and Crossrail centres, based on 6 neighbourhoods.
- Direct significant levels of growth at high density to all neighbourhoods.
- Direct significant levels of growth to Stratford as Metropolitan Centre and to Opportunity Areas only.

4.3.12 The options have been assessed using the scoring system set out in **Table 4.3**.

4.3.13 **Section 5.2** and **Appendix E** of this report provide more background on the reasons for selecting the reasonable alternatives for consideration, the results of the assessment of reasonable alternatives and the reasons for selecting the preferred alternative.

**Table 4.3 Scoring System**

Significance of effect		Description of effect
++	Significant positive	Likely to benefit a large area of the borough and wider area, or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major.
+	Minor positive	The extent of predicted beneficial effects is likely to be limited to small areas within the borough or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor.
0	Neutral	Neutral effects are predicted where the option being assessed is unlikely to alter the present or future baseline situation.

Significance of effect		Description of effect
-	Minor negative	Minor negative effects are likely to be limited to small areas within the borough or limited to small groups of people and receptors and or those with low sensitivity to change. The effects can be direct or indirect, temporary or reversible. The importance of the receptor that is affected is likely to be minor, as is the magnitude of the predicted effect.
--	Significant negative	Likely to affect the whole, or large areas of the borough and the wider area. Also applies to effects on nationally or internationally important assets. The effects are likely to be direct, irreversible and permanent and or those with high sensitivity to change. The magnitude of the predicted effects will also be major.
+/-	Mixed Score	This could be any combination of minor or significant positive or negative effects or an indication that there is uncertainty.
?	Unknown	This significance criterion is applied to effects where there is insufficient information to make a robust assessment. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other.
~	No relationship	This is applied to objectives that are clearly not affected by the option or policy being assessed.

## The approach to planning for 15 minute neighbourhoods

4.3.14 The Council identified the following reasonable alternatives in relation to planning for a network of neighbourhoods:

- Creating a network of 15 minute neighbourhoods which ensures all residents have access to community facilities, transport, employment opportunities and shops within easy reach of their homes. Through new district centre at Beckton Riverside, new and expanded local centres protecting and expanding the borough's network of neighbourhood parades and by directing these uses primarily to Town Centres, as well as allowing smaller facilities to be located in a wider range of locations to reduce gaps in the 15 minute network;
- Maintain town centre first approach without looking to fill the gaps in the 15 minute network; and
- No restrictions on scale or location of these uses (retail and community uses) outside of designated centres to fill all gaps in the 15 minute network.

4.3.15 **Section 5.3** and **Appendix E** of this report provide more background, the results of the assessment of reasonable alternatives and the reasons for selecting the preferred alternative.

## Amount of Housing and Employment Growth

- 4.3.16 As noted above the London Plan 2021 sets out a target for the minimum number of homes to be provided in the period 2019 to 2028/29, consequently no reasonable alternatives are identified. The London Plan 2021 sets out a target for the number of jobs to be provided over the plan period but is not prescriptive in terms of the amount of floorspace to be provided.
- 4.3.17 The Council's Employment Land Review identified three options in relation to the provision of new industrial floorspace:
- 335,000 sq m of new industrial to 2038 based on the past trends (jobs) approach which is higher than the forecast figure;
  - 197,000 sq m based on economic forecasts; and
  - 127,000 sq m based on a 5 year annual floorspace trend.
- 4.3.18 These are discussed in **Section 5.4** and **Appendix E** of this report.

## Sustainability Appraisal of Reasonable Alternatives for Policies

- 4.3.19 Officers have identified various options for each of the policy themes that the Local Plan considers, some of these are very detailed in nature. Consideration is being given to whether or not these need to be treated as reasonable alternatives for the purposes of the assessment. Examples of this work include the extent to which policy in relation to public realm net gain should focus on off-site contributions to the public realm, rather than contributions to on-site improvements, the role of different centres in terms of night time entertainment, whether or not there should be flexibility in the application of guidelines for school buildings to enable more compact schools etc, Work on this element of the IIA is on-going and will be informed by comments on the Regulation 18 draft Local Plan and this IIA.

## Sustainability Appraisal of the Draft Local Plan Vision and Key Objectives

- 4.3.20 The Draft Local Plan contains a vision and strategic objectives. These are set out at **Section 1.3** of this report. There is no prescribed format for assessing these elements of a Plan and the approach taken in this instance was to assess the Local Plan vision and objectives using the IIA objectives. **Table 4.5** shows the scoring system.

## Sustainability Appraisal of the Proposed Policies

- 4.3.21 Policies have been assessed against the IIA Framework by draft Local Plan topic section (e.g. housing, economy etc.) with a separate matrix produced for each section and each policy assessed individually within that matrix. **Table 4.5** shows the scoring system. The Local Plan includes policies for neighbourhoods and these have also been assessed.
- 4.3.22 The matrix identifies potential effects for each policy and whether or not they are considered significant; for each objective there is also an opportunity to record any suggested mitigation (or changes to policy) and any assumptions and uncertainties. The appraisal of thematic policies in the Regulation 18 draft Local Plan are summarised in **Section 5.6** with the detailed appraisal matrices provided at **Appendix F**. Neighbourhood policies are discussed in **Section 5.7** and **Appendix G**.

- 4.3.23 A set of initial recommendations that was previously provided to the Council is presented in **Section 5.14** of this report showing if/how these have been incorporated in the Regulation 18 version of the Local Plan. IIA is an iterative process and the recommendations will be kept under review.

## Sustainability Appraisal of Allocations and Consideration of Reasonable Alternatives

- 4.3.24 Paragraph 68 of the NPPF requires that Local Plans contain planning policies that “*should identify a sufficient supply and mix of [housing] sites, taking into account their availability, suitability and likely economic viability*”. In response, in preparing the Regulation 18 Local Plan, the Council undertook an initial appraisal of housing sites from a range of sources, including:
- The ‘call for sites’ exercise (October to December 2021) where residents, landowners and other interested parties were asked to submit details of land or buildings in the borough which could be redeveloped to 2038;
  - Sites allocated in the Adopted Local Plan;
  - Brownfield Land Register;
  - GLA SHLAA;
  - Employment Land Review;
  - Planning applications and pre-applications;
  - Council owned sites;
  - Waste evidence base; and
  - any other know sites via planning policy team intelligence
- 4.3.25 The Council’s process for identifying and assessing potential sites is described in the Council’s ‘Site Allocation and Housing Trajectory Methodology Note’. At the sifting stages the Council assessed sites suitability, availability and achievability of sites. If no ‘showstoppers’ were identified on a site then they proceeded to the next stage of assessment. For small sites (smaller than 0.25ha) a view was taken on whether it was necessary to allocate a site based on whether it was necessary to achieve the overall vision for a neighbourhood as part of the assessment of suitability.
- 4.3.26 Once the more detailed site assessment was undertaken, including landowner engagement and allocating uses to sites, an assessment was then undertaken on all sites based on the following questions:
- Is the site suitable, available, achievable?
  - Does the site contribute to the spatial strategy and/or is it necessary to deliver the neighbourhood vision? – this question considered the role of the site in delivering the spatial strategy in terms of type and quantum of uses and infrastructure and factors such as whether it is the only developable site in the neighbourhood, whether it would help deliver the vision for the neighbourhood or help overcome a key challenge for the neighbourhood.
  - Could the same outcomes be achieved by other means? - This included an assessment of whether the Council could achieve the same thing without as allocating the site, for example through the implementation of neighbourhood policies/design



guidance/the implementation of a planning permission/brownfield land register. This approach is consistent with Paragraph 23 of the NPPF.

- 4.3.27 The Council identified 44 sites that it considered to be potentially appropriate for allocation in the Local Plan because they were suitable, deliverable and would contribute to the objectives of the Local Plan as outlined above.
- 4.3.28 Each of these sites has been appraised against the IIA Framework using the site-specific criteria to identify the effects. The appraisal findings are pre-mitigation but take account of the proposed uses that sites could accommodate.
- 4.3.29 As detailed in the IIA Framework for sites at **Appendix H**, there are 7 IIA objectives where the evaluation of effects for sites requires a level of detail that was not available for the site appraisal and so they were not used. These are:
- SO5: Economic benefits;
  - SO9: Climate change;
  - SO10: Sustainable design;
  - SO11: Natural resources;
  - SO17: Waste;
  - SO20: Young people;
  - SO21: Crime.
- 4.3.30 In consequence, scoring against these IIA objectives is recorded as neutral in **Appendix H**.
- 4.3.31 **Section 5.8** provides commentary outlining the relevant information where likely significant negative effects have been identified for sites. The appraisal results for sites against the remaining 15 IIA objectives are set out in **Appendix H**.

## 4.4 Cumulative, Synergistic and Secondary Effects

- 4.4.1 The SEA regulations require that the secondary, cumulative and synergistic effects of the Local Plan are assessed. It will be important to consider the combined sustainability effects of the policies and proposals of the Local Plan both alone and in-combination with other plans and programmes.
- 4.4.2 Consideration has therefore been given to the potential for cumulative effects that the Local Plan policies and sites could have, including the potential for in-combination effects with other plans and programmes. The results of the assessment are set out in **Section 5.9** and **Table 5.14**.

## 4.5 Health Impact Assessment

- 4.5.1 The Scoping Report provides useful background on health impact assessment and health issues in the borough, this is summarised below, together with the approach taken to the HIA.

### What is a Health Impact Assessment?

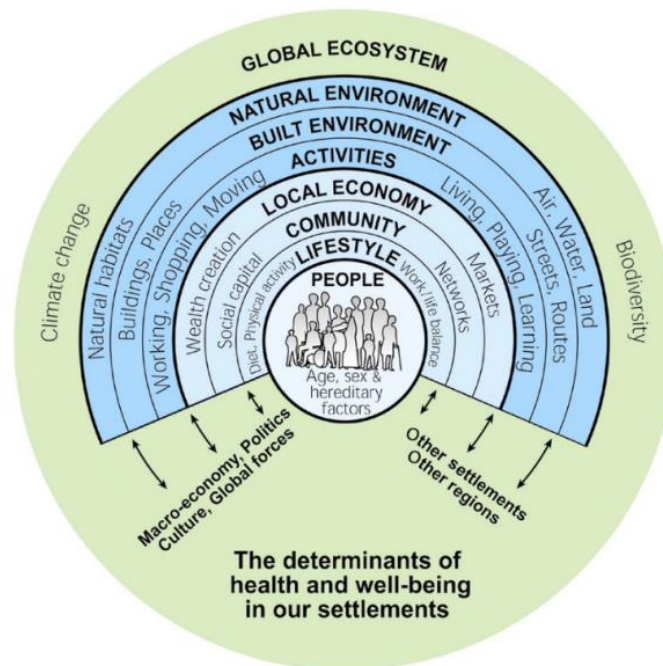
- 4.5.2 A Health Impact Assessment (HIA) is a useful tool that helps to ensure that health and wellbeing is being properly considered in planning policies and proposals. HIAs provide a

systematic approach for assessing the potential health and wellbeing impacts (benefits and harms) of a Local Plan on the social, psychological and physical health of communities.

- 4.5.3 HIAs are designed to consider whether a policy might reinforce health inequalities and inadvertently damage people’s health, or actually have positive health outcomes for the local community. It helps us to develop recommendations to maximise the positive impacts and minimise the negative impacts, while maintaining a focus on addressing health inequalities. Ensuring issues are considered at an early stage in developing Local Plan proposals can lead to improvements in both the physical and mental health of the population.
- 4.5.4 The linkages between health and the built and natural environment have long been established and the role of the environment in shaping the social, economic and environmental circumstances that determine health is increasingly recognised and understood. The ‘wider determinants of health’, sometimes called the ‘social determinants of health’ are the many factors that influence whether or not people live healthy lives (the picture in **Figure 4.1** was devised to illustrate these).

**Figure 4.1 The wider determinants of health**

THE DETERMINANTS OF HEALTH AND WELLBEING  
IN OUR SETTLEMENTS



Source: Barton and Grant, 2006

- 4.5.5 Newham’s Health and Wellbeing Strategy: [‘Well Newham 50 Steps to a Healthier Borough, 2020-2023’](#) is set around 12 Priorities – these are issues of importance to the health and wellbeing of people living and working in Newham (see **Figure 4.2** below). The 12 Priorities have a clear crossover and relevance to the elements listed above. To ensure the Local Plan HIA framework is tailored to the needs of Newham’s communities it will address each of the 12 Priorities of the Health and Wellbeing Strategy.

## Figure 4.2 Health and Wellbeing Strategy Priorities - Newham



4.5.6 The Scoping Report presented the Framework for the HIA. It has been structured around the 12 Priorities set out in Newham’s Health and Wellbeing Strategy and draws on NHS London Healthy Urban Development Unit’s (HUDUs) HIA methodology.

4.5.7 The ability of the Local Plan to contribute to these priorities varies. The Scoping Report includes a useful analysis of the 12 priorities against the Local Plan themes considered at Issues and Options stage, highlighting the synergy between themes and priorities.

4.5.8 Health impacts may be short-term or temporary, related to construction or longer-term, related to the operation and maintenance of a development and may particularly affect vulnerable or priority groups of the population. Where an impact is identified, actions should be recommended to mitigate a negative impact or enhance or secure a positive impact.

4.5.9 The extent to which the draft Local Plan policies will contribute to each of the priorities has been considered. The results of the exercise are discussed in **Section 5.10** of this report and the completed framework is enclosed as **Appendix I**.

## 4.6 Approach to the EqIA

4.6.1 Under the Equality Act 2010 and Public Sector Equality Duty, the requirement to conduct an equality analysis is designed to provide a mechanism for ensuring that “due regard” is given to minority groups in the decision-making and activities of the Council. Specifically, a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

4.6.2 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and

- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 4.6.3 The Council has developed an EqIA Framework which guides the EqIA on the draft Local Plan and Submission Local Plan. It has been prepared in the context of the overall vision for Newham, which is for a Healthy, Happy and Well Newham, achieved through the principles of Community Wealth Building, Brighter Futures – The Best Place for Children and Young People to Thrive, Tackling Racism, Inequality and Disproportionately and Putting People at the Heart of Everything We Do.
- 4.6.4 This vision is supported through eight pillars of action, which will form the basis for the objectives of the EqIA framework:
- **Pillar 1:** Our measures of success will be the health, happiness and wellbeing of our residents, rather than growth, productivity and land value.
  - **Pillar 2:** The Council will ensure every resident under 25 is safe, happy and cared for, with positive activity to secure their long-term wellbeing.
  - **Pillar 3:** The Council will take action to ensure all residents are supported and enabled to access work and other opportunities in the new economy.
  - **Pillar 4:** The Council will make sure our residents are healthy, happy, safe and cared for, to enable them to thrive during times of recession and in the new economy.
  - **Pillar 5:** The Council will enable every resident to live in an accessible and inclusive neighbourhood which will provide all of their social, civic and economic essentials.
  - **Pillar 6:** We will become London’s greenest local economy.
  - **Pillar 7:** The Council will deliver genuinely high-quality and affordable homes for Newham.
  - **Pillar 8:** The Council will only welcome investment that secures a Fair Deal and Good Growth for Newham.
- 4.6.5 The questions contained within **Table 4.4** have been used to assess the draft Local Plan in terms of its contribution to achieving these objectives and to discharge the Public Sector Equality Duty. The table includes an indication of the relevance of each question to the groups identified. The table is adapted from the Scoping Report and has been updated. It includes an indication of whether or not the Council considered the question relevant to each group (✓) not relevant (-) or uncertain (?). The assessment identifies whether draft policies are expected to have positive impacts. Where any negative impacts are identified, the nature and scale of these impacts must be understood and to consider how to mitigate these negative impacts.
- 4.6.6 It should be noted that EqIAs have also been undertaken to inform policy and proposals relating to specific regeneration areas within the borough and regard has also been had to the results of this work, so as to avoid duplication.

**Table 4.4 EqlA Guide Questions from the Scoping Report**

Will this policy...	Socio-economic	Age	Disability	Gender Reassignment	Marriage and civil partnership	Pregnancy/maternity	Race	Religion or belief	Sex	Sexual Orientation
1. Reduce poverty, including child poverty, and social exclusion?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
2. Reduce health inequalities?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
3. Help improve mental and physical health and wellbeing?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
4. Provide opportunities for residents of every background to connect?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
5. Promote an inclusive design approach, ensuring a barrier free environment for all?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
6. Create an environment that feels safe to all users during the day time and night time?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓

Will this policy...	Socio-economic	Age	Disability	Gender Reassignment	Marriage and civil partnership	Pregnancy/maternity	Race	Religion or belief	Sex	Sexual Orientation
7. Help to make people feel positive about the area they live in and promote social integration?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
8. Encourage the retention and development of key services and facilities?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
9. Ensure equity of access to environmental, social and physical infrastructure?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
10. Create green and blue spaces that are safe and accessible to all?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
11. Increase the amount, range, quality and affordability of housing?	✓	✓	✓	✓	✓	✓	✓	✓	?	?
12. Increase the choice of accessible and adaptable homes?	-	✓	✓	-	-	-	-	✓	-	-
13. Provide housing that encourages a	✓	✓	✓	✓	-	✓	✓	✓	✓	✓



Will this policy...	Socio-economic	Age	Disability	Gender Reassignment	Marriage and civil partnership	Pregnancy/maternity	Race	Religion or belief	Sex	Sexual Orientation
sense of community and enhances the amenity value of the community?										
14. Minimise barriers to employment?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
15. Help provide employment opportunities close to home, particularly to those most economically excluded?	✓	✓	✓	✓	✓	✓	✓	✓	✓	?
16. Help to provide employment opportunities in the most deprived areas?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
17. Help to improve learning and the attainment of skills to access employment opportunities?	✓	✓	✓	?	-	✓	✓	?	✓	?
18. Reduce impacts on groups more vulnerable to the effects of climate change?	✓	✓	✓	-	✓	-	✓	-	-	-

Will this policy...	Socio-economic	Age	Disability	Gender Reassignment	Marriage and civil partnership	Pregnancy/maternity	Race	Religion or belief	Sex	Sexual Orientation
19. Reduce inequalities in access to clean air?	✓	✓	✓	-	-	✓	✓	?	-	-
20. Improve accessibility of all public transport modes?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
21. Minimise and reduce road, rail, and aviation noise and vibration levels and disruption?	✓	✓	✓	-	-	✓	✓	?	-	-
22. Minimise negative impacts of waste processing and disposal on vulnerable groups?	✓	✓	✓	-	-	✓	✓	?	?	-
23. Contribute to the provision of smart and affordable energy system for all?	✓	✓	✓	?	-	?	✓	?	?	?
24. Increase access to, enjoyment of and understanding of the historical and natural environment?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
25. Increase opportunities	✓	✓	✓	-	-	✓	✓	✓	✓	-

Will this policy...	Socio-economic	Age	Disability	Gender Reassignment	Marriage and civil partnership	Pregnancy/maternity	Race	Religion or belief	Sex	Sexual Orientation
for physical activity or play?										
26. Reduce digital exclusion?	✓	✓	✓	-	-	-	?	?	-	-

4.6.7 The assessment identifies whether draft policies are expected to have positive impacts for certain groups and how they could maximise these positive benefits. Where negative impacts are identified, the nature and scale of these impacts must be understood and to consider how to mitigate these negative impacts. This considers:

- Could it affect some groups differently?
- Could it advance equality?
- Could it foster good relations?

4.6.8 **Section 5.11** of this report discusses the results of the exercise and the completed checklist is provided at **Appendix J**.

## 4.7 Approach to the HRA

4.7.1 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the ‘Habitats Regulations’) states that if a land-use plan “(a) is likely to have a significant effect on a European site<sup>4</sup> or a European offshore marine site<sup>5</sup> (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site” then the plan-making authority must “...make an appropriate assessment of the implications for the site in view of that site’s conservation objectives” before the plan is given effect. The process by which Regulation

<sup>4</sup> Strictly, ‘European sites’ are: any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a ‘Site of Community Importance’ (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the ‘new wild birds directive’) apply; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Habitats Regulations are applied a matter of UK Government policy when considering development proposals that may affect them. “European site” is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

<sup>5</sup> ‘European offshore marine sites’ are defined by Regulation 15 of The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended); these regulations cover waters over 12 nautical miles from the coast.

105 is met is known as Habitats Regulations Assessment (HRA)<sup>6</sup>. An HRA determines whether there will be any ‘likely significant effects’ (LSE) on any European site as a result of a plan’s implementation (either on its own or ‘in combination’ with other plans or projects) and, if so, whether these effects will result in any adverse effects on the site’s integrity. The Council has a statutory duty to prepare the Local Plan and is therefore the competent authority for the HRA.

- 4.7.2 Regulation 105 essentially provides a test that the final plan must pass; there is no statutory requirement for HRA to be undertaken on draft plans or similar developmental stages (e.g. issues and options; preferred options) and so the report does not provide a formal conclusion to the HRA process. However, it is accepted best-practice for the HRA of strategic planning documents to be run as an iterative process alongside the plan development, and so at the Draft Plan stage potential mechanisms by which the Local Plan could affect European sites are identified and (if necessary) measures suggested to ensure significant effects do not occur.
- 4.7.3 The HRA of the Regulation 18 draft Local Plan uses the principles of ‘screening’ to allow the assessment stage to focus on those aspects that are most likely to have potentially significant or adverse effects on European sites, as well as shape the emerging plan. Screening is therefore used to ‘screen-out’ European sites and plan components from further assessment, if it is possible to determine that significant effects are unlikely (e.g. if sites or interest features are clearly not vulnerable (both exposed and sensitive) to the outcomes of a plan due to the absence of any reasonable impact pathways). For the Local Plan, the screening process has been used on the plan ‘as a whole’; on the European sites themselves; and on the key components of the plan (the policies and allocations). The screening takes account of measures that are intended for inclusion in the plan to avoid significant effects.
- 4.7.4 The current European Commission (EC) [guidance](#) suggests a four-stage process for HRA as shown in **Box 1**, although not all stages may be necessary.

### Box 1 – Stages of Habitats Regulations Assessment

#### Stage 1 – Screening

This stage identifies the likely impacts upon a European site of a project or plan, either alone or ‘in combination’ with other projects or plans, and considers whether these impacts are likely to be significant.

#### Stage 2 – Appropriate Assessment

Where there are likely significant effects, or effects are uncertain, then ‘appropriate assessment’ is required. This stage considers the impacts of the plan or project on the integrity of the relevant European sites, either alone or ‘in combination’ with other projects or plans, and with respect to the sites’ structure and function and their conservation objectives. Where there are adverse impacts, it also includes an assessment of the potential mitigation for those impacts.

#### Stage 3 – Assessment of Alternative Solutions

<sup>6</sup> The term ‘Appropriate Assessment’ has been historically used to describe the process of assessment; however, the process is now more usually termed ‘Habitats Regulations Assessment’ (HRA), with the term ‘Appropriate Assessment’ limited to the specific stage within the process; see also Box 1.

### Box 1 – Stages of Habitats Regulations Assessment

Where adverse impacts are predicted, this stage examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of European sites.

#### Stage 4 – Assessment Where No Alternative Solutions Exist and Where Adverse Impacts Remain

This stage assesses compensatory measures where it is deemed that the project or plan should proceed for imperative reasons of overriding public interest (IROPI). The EC guidance does not deal with the assessment of IROPI.

- 4.7.5 Potential effects on all European sites within 20km of the Borough's boundary have been considered, together with any additional sites that may be hydrologically linked to the plan's zone of influence. This is considered to be a suitably precautionary starting point for the assessment of the plan. Often, however, sites or interest features within a study area can be excluded from further assessment at an early stage ('screened out') because the plan or project will self-evidently have either 'no effect' or 'no significant effect' on these sites (i.e. the interest features are not sensitive to likely effects of plan or project; or are not likely to be exposed to those effects due to the absence of any reasonable impact pathways).
- 4.7.6 The approach taken is to identify the current factors affecting sites and their conservation objectives then to screen the policies in the draft Local Plan to see if they would contribute to any existing problems. The HRA is a free standing report and the results are discussed in **Section 5.12** of this report.

## 4.8 Working on the IIA

- 4.8.1 The IIA is an on-going process and will continue as the Local Plan develops up to adoption. This section sets out the approach to the work and what has been done to date.

### Who Undertook the IIA and When?

- 4.8.2 The Council prepared the Scoping Report for the IIA and consulted on that. WSP, working in conjunction with Council officers, have then completed the IIA Report to accompany the Regulation 18 draft Local Plan.
- 4.8.3 Work on the assessment stage commenced in February 2022 following an inception meeting on the 2<sup>nd</sup> of February 2022 to agree the methodology for the IIA, initial timetable and the approach to integrating the IIA and plan making. A series of Technical Notes (for Council use only) were then produced. The notes comprised of a review of an initial draft set of policies, the development and inclusion of site assessment criteria to the IIA Framework and the approach to the consideration of options and reasonable alternatives, these were used to inform the development of the draft Local Plan.

### Comments on the IIA to date

- 1.9.2 The Council consulted on the scope of the IIA between 18 October and the 17 December 2021. This included the draft IIA Framework which comprised 22 sustainability objectives and associated prompt questions with each of the objectives linked to indicators for the Local Plan monitoring framework. A limited number of comments were received on the

Scoping Report, including more general comments on the SA and HRA. The Council has reviewed these comments and responded to them (see **Appendix B**).

- 1.9.3 The Environment Agency responded with a number of detailed comments on the IIA Framework. Two comments related the sustainability objectives as follows:
- SO11: ‘Natural Resources’ with a request to include a reference to groundwater quality in the objective’s prompt questions;
  - SO12: ‘Flood risk’ with a request for the objective prompt questions to consider flood risk from the sea, rivers and surface water
- 1.9.4 These requested changes were accepted and included in the amended IIA Framework, used to undertake the appraisal.
- 1.9.5 The Environment Agency also requested inclusion of an additional monitoring indicator: “number of new builds approved that meet London Plan 2021 targets, and to number of existing buildings retrofitted with efficiency measures as a result of planning / building regulations approval.” This has been included in the IIA Framework.

## Difficulties Encountered in Undertaking the Appraisal

- 4.8.4 The SEA Regulations (Schedule 2 paragraph 8) require a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how).
- 4.8.5 A relevant difficulty at this stage was identification of any variations in performance of alternative approaches against the SA objectives. Both the options and objectives are strategic in nature, making it difficult to necessarily differentiate between options. This is a common issue with work of this nature and not unique to the Newham Local Plan refresh. Uncertainties and assumptions identified at this stage are summarised below.

### Uncertainties

- The exact scale of housing development which will come forward on each site allocation will depend on further detailed site design work undertaken through the application process. A range of housing capacities could be delivered while still meeting the design, housing, neighbourhood and site allocation policies and design requirements in the draft Local Plan. As such all allocations delivering housing are assumed to have a significant positive effect, with a degree of uncertainty. This approach may be further refined as preparation of the Local Plan progresses.
- The data gathered to complete the baseline largely pre-dates, or coincides with, the Covid-19 pandemic and its environmental, social and economic effects. Data that relates to these changes is only becoming available periodically and it may well be a number of years before the effects of the crisis can be determined, along with whether changes to the topics covered in the baseline have been short-term or sustained.
- The exact composition and design of future development proposals is unknown and would be subject to planning approval;
- The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers.
- The level of investment in community facilities and services that may be stimulated by new development is uncertain at this stage and will in part be dependent on the policies of the Local Plan refresh, site specific proposals and viability.



- The exact scale of greenhouse gas emissions associated with Plan options will be dependent on a number of factors including: the exact design of new development; future travel patterns and trends; individual energy consumption behaviour; and the extent to which energy supply has been decarbonised over the plan period.
- The exact scale of waste associated with the Plan options will be dependent on a number of factors including: the design of new development; waste collection and disposal regimes; and individual behaviour with regard to recycling and reuse.
- The consideration of thematic policies identified the potential for options (different approaches to policy) some of them were very detailed and nature. Consideration has been given to whether or not options need to be treated as reasonable alternatives for the purposes of the assessment. This discussion has been documented. IIA is an iterative process and any options that need to be treated as reasonable alternatives can be examined at later stages in the process.

## Assumptions

- For those sites which include parcels with planning consent, it is assumed that socio-economic and environmental impacts have been duly considered as part of the planning application process;
- It is assumed that the Council will continue to liaise with infrastructure providers with regard to infrastructure requirements for future development;
- It is assumed that Environmental Statements will be submitted in support of planning applications for the development of the strategic sites considered in the SA Report, if required, and that appropriate mitigation measures will be identified and implemented;
- It is assumed that, where appropriate, development proposals would be accompanied by a Flood Risk Assessment (FRA) and that areas of flood risk on site will be avoided and that suitable flood alleviation measures would be incorporated into the design of new development where necessary to minimise flood risk; and
- It is assumed that sites identified in the SA would come forward for development as anticipated in the Local Plan.

## 5. Assessment Results

### 5.1 Introduction

5.1.1 This section sets out the results of the assessment of the following:

- Spatial strategy;
- Approach to planning for 15 minute neighbourhoods
- Quantum of Employment Land for Industrial Uses;
- Vision and objectives;
- Thematic policies, including consideration of reasonable alternatives; and
- Site allocations, including consideration of reasonable alternatives.

5.1.2 The section then discusses other elements of the IIA as follows:

- the HIA;
- the EqIA;
- the HRA; and
- Monitoring.

5.1.3 Recommendations arising from the work undertaken to date are then discussed.

### 5.2 Spatial Strategy

#### Overview

5.2.1 This section describes the reasonable alternatives for the spatial strategy (having regard to the London Plan 2021 as the statutory spatial development strategy). The reasonable alternatives relating to the spatial strategy and the reasons for selecting them for consideration are set out below in **Table 5.1**.

**Table 5.1 Reasonable Alternatives for the Spatial Strategy (Growth Locations)**

Option	Description	Reason for consideration
1	Directing significant levels of growth to neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area, neighbourhoods along the River Lea which form part of the cross boundary Poplar Riverside Opportunity Area and to the Stratford and Maryland neighbourhood, supported by a redesigned Stratford Station, with incremental character-led intensification and change in other neighbourhoods. All 16 neighbourhoods to experience some degree of change, influenced by individual policies informed by the specific needs of that neighbourhood.	Consistent with the London Plan 2021 and 15 minute neighbourhood principle.

Option	Description	Reason for consideration
2	Retain the Arc of Opportunity and Urban Newham. Arc of Opportunity is focus of job creation, infrastructure development, new town and local centres and vast majority of new housing. In Urban Newham there is incremental and small change focussed in town and local centres and Crossrail centres, based on 6 neighbourhoods.	This is the approach set out in the Adopted Local Plan.
3	Direct significant levels of growth at high density to all neighbourhoods.	Logical alternative to consider impact of delivering high levels of growth across the borough
4	Direct significant levels of growth to Stratford as Metropolitan Centre and to Opportunity Areas only.	Focuses development in key areas in the borough as outlined in the London Plan 2021.

## Summary of Effects

5.2.2 Key results are summarised below in **Table 5.2** and at **Appendix E**.

5.2.3 In assessing these options there were uncertainties around:

- The difference between the balance of housing development in Opportunity Areas and other areas under each scenario;
- How employment requirements would be met under each option – and if there would there be any discernible difference between them in this respect
- If there other factors to consider: infrastructure capacity, site availability etc. that would influence the effects associated with each option.

5.2.4 A number of uncertainties were identified in relation to the outcomes of Options 2, 3 and 4 in particular because of uncertainties around how development would be accommodated under these options, particularly in areas outside of those that are the focus of growth. As an example, all of the options have potential to address existing open space deficiencies to some degree but opportunities might be more localised under Options 2, 3 and 4.

5.2.5 Option 1 could provide opportunity for the greatest granularity, if based on 16 neighbourhoods, rather than the 6 neighbourhoods associated with Option 2.

5.2.6 Options 1,2 and 3 could have significant positive effects in relation to SO1: 'Town centres,' although there is some uncertainty as to how development would be distributed across the borough under Options 2 and 3 and the potential for minor negative effects on other centres is identified under these two options, with some uncertainty.

5.2.7 Options 1,2 and 3 could have significant positive effects in relation to SO2: 'Neighbourhoods' as they would all direct development to neighbourhoods to some degree. Option 3 could give rise to negative effects as not all neighbourhoods may be able to accommodate growth at the scale required.

5.2.8 Outcomes relating to SO5: 'Economic benefits' are potentially significant with some uncertainty. Option 1 provides the most potential for benefits to be shared (and therefore potentially retained) across the borough.

**Table 5.2 Appraisal of Reasonable Alternatives for the Spatial Strategy**

Sustainability Objective (SO)	Option 1	Option 2	Option 3	Option4
SO1: Town Centres	++	++/?	++-/?	+/-/?
SO2: Neighbourhoods	++/?	++/?	++-/?	+/-/?
SO3: Place-making	?	?	?	?
SO4: Employment	+/?	+/?	+/?	+/?
SO5: Economic benefits	++/?	++/?	++/?	++/?
SO6: Education	+	+	+	+/?
SO7: Housing stock	+	+	+	+/?
SO8: Housing supply	+	+/?	+	+/?
SO9: Climate change	+	+/?	+/?	+/?
SO10: Sustainable design	+	+/?	+/?	+/?
SO11: Natural resources	+/-/?	+/-/?	+/-/?	+/-/?
SO12: Flood risk	+	+/?	+/?	+/?
SO13: Land quality	0	0	0	0
SO14: GBI	+	+/?	+/-/?	+/?
SO15: Biodiversity	+	+/?	+/-/?	+/?
SO16: Sustainable transport	+	+/?	+/-/?	+/?
SO17: Waste	+/-/?	+/-/?	+/-/?	+/-/?
SO18: Community facilities	+	+/?	+/-/?	+/?
SO19: Inclusion	+	+/?	+/-/?	+/?
SO20: Young people	+	+	+	+
SO21: Crime	0	0	0	0
SO22: Health and wellbeing	+	+	+	+

## Reasons for the Selection of the Preferred Spatial Strategy and for the Rejection of Alternatives

5.2.9 **Table 5.3** sets out the Council's reasons for selecting the preferred reasonable alternative and rejecting the others.

**Table 5.3 Reasons for the Selection of the Preferred Spatial Strategy and for the Rejection of Alternatives**

Option	Council's reason selection	Council's reason for rejection
1	Consistent with the London Plan 2021 by following a design and character-led approach to where growth can be accommodated as well as the role of small sites in delivering incremental change. Ensures the benefits of growth are distributed across the borough in line with council objectives, both through new housing and through services and facilities as part of the 15 minute neighbourhood principle.	-
2	~	This would create a significant divide between areas of change and areas with no change in the borough. It would reduce the areas which would directly benefit from growth. It may reduce the quantity of housing and other development coming forward in the borough, as policies would be less enabling of growth on smaller sites.
3	~	This would lead to significant heritage/local character impacts which would undermine the design-led approach in the London Plan 2021. Could also lead to loss of other priority land uses.
4	~	This would create a significant divide between areas of change and areas with no change in the borough. It would reduce the areas which would directly benefit from growth. It may reduce the quantity of housing and other development coming forward in the borough, as policies would be less enabling of growth on smaller sites.

## 5.3 The approach to planning for 15 minute neighbourhoods

### Overview

This section describes the reasonable alternatives for the approach to planning for 15 minute neighbourhoods. The reasonable alternatives identified by the Council are summarised in **Table 5.4**.

**Table 5.4 Reasonable alternatives for planning for 15 minute neighbourhoods**

Option	Description	Reason for consideration
1	Creating a network of 15 minute neighbourhoods which ensures all residents have access to community facilities, transport, employment opportunities and shops within easy reach of their	Proposed approach in the Draft Local Plan.

Option	Description	Reason for consideration
	homes. Through new district centre at Beckton Riverside, new and expanded local centres protecting and expanding the borough's network of neighbourhood parades and by directing these uses primarily to Town Centres, as well as allowing smaller facilities to be located in a wider range of locations to reduce gaps in the 15 minute network.	
2	Maintain town centre first approach without looking to fill the gaps in the 15 minute network	Follows the town centre first approach in the NPPF and London Plan 2021 and approach in the current adopted Plan.
3	No restrictions on scale or location of these uses (retail and community uses) outside of designated centres to fill all gaps in the 15 minute network	Firmer adherence to 15 minute neighbourhood principles which may increase access to services, shops, employment and community facilities across the borough.

## Summary of effects

- 5.3.1 Key results are summarised below in **Table 5.5** and at **Appendix E**.
- 5.3.2 All three options would see the creation of new development within existing centres, with Option 1 creating a new district centre and local centres. Option 3 could harm the vitality or viability of existing town centres at the same time, by encouraging town centre uses outside of designated centres (and uncertainties are identified on that basis). A significant positive effect is therefore identified for SO1: 'Town Centres' for all options.
- 5.3.3 All three options would provide retail, leisure cultural and potentially other development associated with centres within the borough. Options 1 and 3 have the potential to provide such development in more places than Option 2, as these policies are more likely to create new town centres and/or requires for such uses to be spread out across the borough (under the 15 minute neighbourhood principle), potentially increasing access and choice. A significant positive effect is therefore identified for SO2: 'Neighbourhoods'.
- 5.3.4 All three options would enable new retail related economic development within the borough and would therefore have significant positive effects (subject to any negative impacts on existing uses).
- 5.3.5 Option 2 would limit such opportunities to existing town centres, which could prejudice the ability of people to set-up business (as available space will likely be limited and rents will be potentially higher than other locations). Option 1 would create a new district and local centres, potentially providing wider locational choice. Similarly, Option 3 would achieve this by allowing retail and community uses across the borough, providing the most choice. A significant positive effect is therefore identified for SO4: 'Employment'.
- 5.3.6 The options would all provide economic benefits to the borough through allowing for new business to be created within it alongside employment opportunities. The extent to which such benefits will be retained within the borough is uncertain and therefore some uncertainties are identified alongside significant positive effects. A significant positive effect is therefore identified for SO5: 'Economic benefits'.
- 5.3.7 All of the options would create development within Newham that would create highly accessible places containing town centre uses and community facilities. Option 2 would be limited to only improving/expanding existing town centres, potentially meaning



residents have to use less sustainable transport to reach needed services as none are located nearby. Option 1 and 3 would provide highly accessible places in a wider variety of places (especially Option 3). The impact of Option 3 is difficult to gauge, a more dispersed pattern of provision might reduce the distance travelled and encourage walking and cycling, equally it might lead to more travel by car if development takes place in areas where Public Transport Accessibility Levels are low, as the provision of retail and community facilities becomes more dispersed. A significant positive effect (with uncertainty) is therefore identified for SO16: 'Sustainable transport'.

- 5.3.8 All of the options would have significant positive effects due to allowing for the creation of new community facilities. Option 2 would keep such facilities to existing centres, whilst Option 1 and Option 3 would allow for such facilities in more places (especially Option 3). A significant positive effect is therefore identified for SO18: 'Community facilities'.
- 5.3.9 The options would provide community facilities within Newham and places for people to gather and interact through the creation or support of town centre development. This would lead to all of the Options aiding in encouraging community cohesion and reducing inequalities in terms of accessing needed facilities. A significant positive effect is therefore identified for SO19: 'Inclusion'.
- 5.3.10 The options would create community facilities and employment opportunities that would be well placed to service the needs and provide opportunities to young people's needs, providing significant positive effects. A significant positive effect is therefore identified for SO20: 'Young people'.

**Table 5.5 Appraisal of Reasonable Alternatives for planning for 15 minute neighbourhoods**

Sustainability Objective (SO)	Option 1	Option 2	Option 3
SO1: Town Centres	++	++	++/?
SO2: Neighbourhoods	++	++	++
SO3: Place-making	+/?	+	+/?
SO4: Employment	++	++	++
SO5: Economic benefits	++	++	++
SO6: Education	+	+/?	+
SO7: Housing stock	~	~	~
SO8: Housing supply	~	~	~
SO9: Climate change	+	+/?	+
SO10: Sustainable design	+	+	+
SO11: Natural resources	+/-	-	+/-
SO12: Flood risk	~	~	~
SO13: Land quality	~	~	~
SO14: GBI	~	~	~
SO15: Biodiversity	~	~	~

Sustainability Objective (SO)	Option 1	Option 2	Option 3
SO16: Sustainable transport	++	++/?	++/?
SO17: Waste	+/-/?	+/-/?	+/-/?
SO18: Community facilities	++	++	++
SO19: Inclusion	++	++	++
SO20: Young people	++	++	++
SO21: Crime	+	+	+
SO22: Health and wellbeing	~	~	~

## Reasons for the Selection of the Preferred approach to neighbourhoods and for the Rejection of Alternatives

5.3.11 **Table 5.6** sets out the Council's reasons for selecting the preferred reasonable alternative and rejecting the others.

### Table 5.6 Reasons for the Selection of the Preferred approach to neighbourhoods and for the Rejection of Alternatives

Option	Council's reason for selection	Council's reason for rejection
1	<p>Evidence in the Retail and Leisure Centre on how the town centre hierarchy is performing and analysis of where gaps exist for town centre uses and community facilities as part of the 15 minute network.</p> <p>Better reflection of the existing spatial distribution of community facilities and resident feedback that they play a valued role outside of Town Centres.</p> <p>Commitment to delivering the Council's objective for residents to live in 15 minute neighbourhoods.</p> <p>Still ensures a balance with protecting the vitality of Town Centres and limiting highways and amenity impacts.</p>	-
2		<p>May improve the vitality and viability of existing Town Centres but would reduce access to and choice of facilities for residents in some of the borough and may reduce viability for smaller shops or community facilities who can't afford Town Centre locations.</p>
3		<p>This option may run counter to the NPPF.</p> <p>It would harm the viability and vitality of existing Centres as part of the Town</p>

Option	Council's reason for selection	Council's reason for rejection
		Centre first approach. It may also increase amenity / neighbourliness conflicts between uses and may increase use of unsustainable transport to reach less accessible locations.

## 5.4 Quantum of Employment Land for Industrial Uses to 2038

### Overview

- 5.4.1 This section describes the reasonable alternatives for the quantum of employment land for industrial uses in the borough. The reasonable alternatives identified by the Council are summarised in **Table 5.7**.

**Table 5.7 Reasonable alternatives for the quantum of employment land for industrial uses to 2038**

Option	Description	Reason for consideration
1	Plan for 335,000 sqm of new industrial floorspace	Reasonable alternative identified in the Employment Land Review 2022 based on the past trends (jobs) approach which is higher than the forecast figure.
2	Plan for 127,000 sqm of new industrial floorspace	Reasonable alternative identified in the Employment Land Review 2022 based on a 5 year past annual average floorspace trend projected forward for the Plan period. Such an approach could reduce the land take needed and provide land for other uses, such as housing.
3	Plan for 197,000 sqm of new industrial floorspace.	Reasonable alternative identified in the Employment Land Review 2022 based on economic forecasts. Such an approach could reduce the land take needed and provide land for other uses, such as housing.

### Summary of Effects

- 5.4.2 Key results are summarised in **Table 5.8** and **Appendix E**. Significant positive effects have been identified for the options against SO4: 'Employment' and SO5: 'Economic benefits' due to the employment and economic benefits accommodating more industrial development would bring to Newham.
- 5.4.3 The relationship of the options to SO3: 'Housing' is complex as the provision of land for employment might result in less land being available for housing. All of the options could impact on the ability of the borough to provide additional housing, particularly Option 1 as

the level of provision for industrial land is higher, however there is a clear tension between maximising housing provision and ensuring a balance between housing and employment provision within the borough and the importance of Newham as a location for employment in the context of the wider London market for such floorspace.

- 5.4.4 Mixed positive and negative effects have been identified in relation to the following objectives: SO9: Climate change, SO11: 'Natural resources,' SO16: 'Sustainable transport,' SO17: 'Waste' It has been assumed that the potential adverse effects from industrial development would be mitigated by policies in the Local Plan and existing regulatory regimes, e.g. associated with emissions to air and water.
- 5.4.5 The industrial floorspace under consideration is associated with forecasted demand and, if not provided for in the borough, would potentially be provided outside of London. Displacing some of the effects identified, e.g. associated with Greenhouse gas emissions (SO9: Climate change) but potentially losing opportunities for efficiencies associated with the movement of goods and materials and encouraging the circular economy (SO11: Natural resources).

**Table 5.8 Appraisal of Reasonable Alternatives for the quantum of employment land for industrial uses**

Sustainability Objective (SO)	Option 1 - 335,000 sqm industrial floorspace to 2038	Option 2 – 127,000 sqm industrial to floorspace 2038	Option 3 - 197,000 sqm industrial to floorspace 2038
SO1: Town Centres	+	+	+
SO2: Neighbourhoods	~	~	~
SO3: Place-making	~	~	~
SO4: Employment	++	++/?	++/?
SO5: Economic benefits	++/?	++/?	++/?
SO6: Education	+	+	+
SO7: Housing stock	~	~	~
SO8: Housing supply	-/?	-/?	-/?
SO9: Climate change	+/-/?	+/-/?	+/-/?
SO10: Sustainable design	0	0	0
SO11: Natural resources	+/-/?	+/-/?	+/-/?
SO12: Flood risk	0	0	0
SO13: Land quality	0	0	0
SO14: GBI	0	0	0
SO15: Biodiversity	0	0	0
SO16: Sustainable transport	+/-/?	+/-/?	+/-/?

Sustainability Objective (SO)	Option 1 - 335,000 sqm industrial floorspace to 2038	Option 2 – 127,000 sqm industrial to floorspace 2038	Option 3 - 197,000 sqm industrial to floorspace 2038
SO17: Waste	+/-/?	+/-/?	+/-/?
SO18: Community facilities	~	~	~
SO19: Inclusion	+	+	+
SO20: Young people	+	+	+
SO21: Crime	~	~	~
SO22: Health and wellbeing	+	+	+

## Reasons for the Selection of the quantum of employment land for industrial uses

5.4.6 **Table 5.9** sets out the Council's reasons for selecting the preferred reasonable alternative and rejecting the others.

### Table 5.9 Reasons for the Selection of the Preferred Amount of Employment land for industrial uses and for the Rejection of Alternatives

Option	Description	Council's reason for selection	Council's reason for rejection
1	Plan for 335,000 sqm of new industrial floorspace	Economic evidence recommends planning for 335,000 sqm (approximately 51ha) of industrial to avoid constraining growth, maximise employment opportunities for residents and contribute to meeting the industrial needs including the wider property market areas i.e. the Central Activity Zone. The higher figure aligns with the market view of industrial demand and the need to take a positive approach of land for economic growth. This target is based on past (2009-19) jobs delivery trends. The Employment Land Review 2022 recommends planning for this figure.	-
2	Plan for 127,000 sqm of new industrial floorspace	~	This level of provision would potentially restrict economic growth, in particular industrial growth (for which there is significant positive demand) which would affect Newham (and due to Newham's location and role) London's economy. The Employment Land Review 2022 suggests that failing to

Option	Description	Council's reason for selection	Council's reason for rejection
3	Plan for 197,000 sq m of new industrial floorspace.	~	<p>make sufficient provision for employment could lead to the relocation of industrial land further and further out of London generating more and more negative sustainability impacts.</p> <p>This level of provision would potentially restrict economic growth, in particular industrial growth (for which there is significant positive demand) which would affect Newham (and due to Newham's location and role) London's economy. The Employment Land Review 2022 suggests that failing to make sufficient provision for employment could lead to the relocation of industrial land further and further out of London generating more and more negative sustainability impacts.</p>

## 5.5 SA of the Regulation 18 Draft Local Plan Vision and Objectives

5.5.1 A matrix has been completed to assess the spatial vision and objectives contained in the draft Local Plan against the IIA objectives. **Table 5.10** presents the results of this compatibility assessment.

### Vision

5.5.2 The vision for Newham as contained within the draft Local Plan is out in **Section 1.3** of this Report.

5.5.3 The vision for the borough seeks to ensure the rapid growth and change within Newham results in a fairer, healthier, and happier place. This will be achieved through encouraging economic and community growth and identity. The vision places great importance on creating more affordable housing within Newham, whilst also ensuring residents have access to sufficient open and green spaces. The businesses, leisure and residential places of the borough should also be transformed to encourage walking and cycling and ensuring residents and visitors have access to whatever they need by such transportation methods. The vision also carries the Council's considerable desire to continue to reduce Newham's contribution to climate change and improve its resilience to the growing effects of it.

5.5.4 The vision has broadly been assessed as being compatible with the majority of the IIA objectives. However, uncertainties exist due to the nature of the vision and the likely outcomes of development within Newham. Uncertainties therefore can exist in terms of the vision and its effects on certain IIA Objectives.

5.5.5 Incompatibilities exist between SO17: 'Reducing waste' and the vision. The vision encouraged a wide range of development that will in the creation of additional waste, even after appropriate mitigation and professional standards are applied.



- 5.5.6 A range of effects are identified by the vision on SO9: 'Climate change', SO11: 'Natural resources', SO14: 'GBI', SO15: 'Biodiversity' as the vision requires development within Newham that could potentially have adverse effects on these IIA Objectives. However, the vision also wishes to see nature filled neighbourhoods and protects local residents and wildlife from being compromised, therefore having a mixture of effects. The vision also seeks to ensure development is well located, potentially helping to reduce natural resource consumption and reduce emissions to air associated with travel.
- 5.5.7 Whilst the vision supports new development and more active modes of travel, the expansion of the borough's economy and housing market would likely lead to some increase in traffic within the borough and therefore mixed scores are identified for IIA Objectives: SO1: 'Town Centres', SO4: 'Employment', SO8: 'Housing supply' and SO16: 'Sustainable transport'.
- 5.5.8 Overall, the vision leaves room for some uncertainties as potential conflicts could arise between growth, resource use and environmental factors such uncertainties are inevitable for any Local Plan that seeks to balance meeting identified needs but the aim should be to meet these objectives in an integrated way). The effects are highly dependent on how economic, social, and environmental sustainability are balanced and it is recommended that the vision includes a statement to the effect that the Local Plan will work towards sustainable development across the three stands (economic, social and environmental) in an integrated way. The vision could also explicitly highlight the need to work towards biodiversity net gain. The commitment to net zero carbon development contributes to SO9: 'Climate change' but the importance of climate change adaptation measures could also be highlighted in the vision.

## Local Plan Objectives

- 5.5.9 The objectives included in the draft Local Plan are set out in **Section 1.3** of this Report. The objectives cover a wider range of economic, socio-economic and environmental themes and are taken from the Building a Fairer Newham Strategy (BaFNS) (2022). Given the nature of the strategy and its associated objectives, none of the objectives have been assessed as being incompatible with the IIA Objectives, some uncertainties have been identified and are outlined below.
- 5.5.10 It can be seen that many of the BaFNS objectives scored as having similar compatibilities across the IIA Objectives. All or most of the BaFNS objectives scored as compatible or highly compatible against the following IIA Objectives: SO1: 'Town Centres', SO2: 'Neighbourhoods', SO3: 'Place-making', SO4: 'Employment', SO10: 'Sustainable design', SO19: 'Inclusion', SO20: 'Young people', SO21: 'Reducing crime' and SO22: 'Health and wellbeing'. The BaFNS objectives would therefore ensure the creation of better town centres and improve the design of neighbourhoods and employment development across Newham. They also would ensure the communities of Newham are supported, with people from all age ranges and backgrounds provided with opportunities to interact and live with their neighbours in a safe and healthy manner.
- 5.5.11 Similarly, the BaFNS objectives scored well against SO6: 'Education', SO7: 'Housing stock', SO8: 'Housing supply', SO13: 'Land quality' and SO18: 'Community facilities', as although not all of the BaFNS objectives would have effects (several scoring neutral against these IIA Objectives), the ones that did scored positively. Scoring neutral against these IIA Objectives is not a flaw of the draft Local Plan objectives, as each objective is specialised towards address specific elements and issues within Newham and differences in the objectives prevents them all being the same.

- 5.5.12 Whilst the BaFNS objectives would provide economic improvements to Newham, uncertainties are identified for SO5: 'Economic benefits' due to it not being possible to know to what extent these benefits would be retained within Newham.
- 5.5.13 The BaFNS objectives have often been assessed as having a mixture of compatible and incompatible effects against SO9: 'Climate change' due to them often resulting in some form of development, which would contribute towards climate change. However, such objectives often also contain mitigating elements such as encouraging an active lifestyle/sustainable transport methods and 15 minute neighbourhoods (reducing the borough's contribution to climate change through reducing transport emissions and making services and facilities accessible).
- 5.5.14 A mixture of compatible and incompatible effects is identified against most of the BaFNS objectives (though Objective One was assessed as purely compatible) against SO11: 'Natural resources', due to them encouraging development that would consume natural resources and potentially having an effect on air quality, whilst also containing some form of self-mitigation, e.g. requiring the creation of 15 minute neighbourhoods and/or ensuring any development would create well designed spaces, ensuring no negative effects on elements such as air quality or water resources. Similarly, such effects are predicted against SO17: 'Reducing waste' due to the BaFNS objectives encouraging development but also often being self-mitigating to some degree (well-designed developments using less resources etc).
- 5.5.15 The BaFNS objectives are mainly silent regarding the issue of flood risk within Newham, besides Objective 3, which creates a broad provision for development to create well-designed spaces. Objective 3 is therefore compatible with SO12: 'Flood risk'.
- 5.5.16 The BaFNS objectives potential effects on SO14; 'GBI' and SO15: 'Biodiversity' is many and often varied, with many often having the potential to provide open/green spaces that could aid local biodiversity, but also encouraging development that would constrain existing such spaces and natural assets.
- 5.5.17 The BaFNS objectives are consistently clear in a requirement to ensure Newham is a well-connected place that is highly accessible by active and sustainable methods of transport, scoring well against SO16: 'Sustainable transport'. Many also encourage the creation of 15 minute neighbourhoods. However, several of the BaFNS objectives also encourage other forms of development, which would or potentially could stress existing transportation infrastructure, even if temporarily.
- 5.5.18 Overall it is concluded that the BaFNS objectives are appropriate for inclusion in the Local Plan and help to ensure that the Local Plan will contribute to the achievement of local priorities.

**Table 5.10 Local Plan Vision and Objectives performance against IIA Objectives**

IIA Objectives	Vision	O1. A healthier Newham and ageing well	O2. An inclusive economy to support people in these hard times	O3. People-friendly neighbourhoods with green and clean streets	O4. Safer Newham where no-one feels at risk of harm	O5. Homes for residents	O6. Supporting young people to have the best start in life and reach their potential	O7. People powered Newham and widening participation in the life of the Borough and the work that the Council does
SO1: 'Town Centres'	++/-	+	+	++	+	+	0	++
SO2: 'Neighbourhoods'	++	+	+	++	+	++	+	++
SO3: 'Place-making'	++	+	+	++	+	+	0	+
SO4: 'Employment'	++/-	+	++	+	+	0	+	+
SO5: 'Economic benefits'	+/?	+/?	+/?	+/?	0	0	+/?	+/?
SO6: 'Education'	++	+	0	0	0	0	++	+
SO7: 'Housing stock'	++	+	0	0	0	++	0	+
SO8: 'Housing supply'	++/-	+	0	0	0	++	0	0
SO9: 'Climate change'	+/-/?	+	+/-	+/-	0	+/-	0	+/-

IIA Objectives	Vision	O1. A healthier Newham and ageing well	O2. An inclusive economy to support people in these hard times	O3. People-friendly neighbourhoods with green and clean streets	O4. Safer Newham where no-one feels at risk of harm	O5. Homes for residents	O6. Supporting young people to have the best start in life and reach their potential	O7. People powered Newham and widening participation in the life of the Borough and the work that the Council does
SO10: 'Sustainable design'	+	+	+	+	0	+	+	+
SO11: 'Natural resources'	+/-	+	+/-	+/-	0	+/-	+/-	+/-
SO12: 'Flood risk'	?	0	0	+	0	0	0	0
SO13: 'Land quality'	+	0	+	+	0	+	+	+
SO14; 'GBI'	+/-/?	+	-/?	+	0	-/?	++	+
SO15: 'Biodiversity'	+/-/?	+	-/?	+/-/?	0	-/?	+/-/?	+
SO16: 'Sustainable transport'	++/-	++	++/-	++/-	0	+/-	+/-/?	+
SO17: 'Reducing waste'	-	+/-	+/-	+/-	0	+/-	+/-	+/-
SO18: 'Community facilities'	+	+	0	+	0	0	++	+
SO19: 'Inclusion'	+	+	+	++	0	++	++	++

IIA Objectives	Vision	O1. A healthier Newham and ageing well	O2. An inclusive economy to support people in these hard times	O3. People-friendly neighbourhoods with green and clean streets	O4. Safer Newham where no-one feels at risk of harm	O5. Homes for residents	O6. Supporting young people to have the best start in life and reach their potential	O7. People powered Newham and widening participation in the life of the Borough and the work that the Council does
SO20: 'Young people'	+	+	+	+	+	+	++	+
SO21: 'Reducing crime'	+	+	+	+	++	+	+	+
SO22: 'Health and wellbeing'	+	++	+	+	+	++	+	+

## 5.6 SA of Thematic policies

### Overview

5.6.1 Policies in the draft Local Plan cover the following topics:

- Building a Fairer Newham (incl. spatial strategy and health & social value);
- Design;
- High Streets;
- Community Facilities and Education;
- Economy;
- Homes;
- Green and Blue Spaces;
- Climate and Flood;
- Transport; and
- Waste and Utilities.

5.6.2 Appraisal matrices for these policies are provided at **Appendix B**. Note that in some instances the assessment of policies is presented in two matrices. Significant effects associated with the policies are summarised below. **Table 5.15** presents suggestions for mitigation and enhancement that have been identified at this stage.

### Building a Fairer Newham – Summary of Significant Effects

5.6.3 The policies are:

- BFN1: Spatial Strategy;
- BNF2: Co-designed Masterplanning;
- BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing; and
- BNF4: Developer Contributions and Infrastructure Delivery.

5.6.4 Policy BFN1 sets out the intention to direct development of an appropriate scale to each of the 16 Neighbourhoods, including the protection of existing facilities and the creation of new ones. Policy BFN2 will contribute to this objective by ensuring that a comprehensive approach is taken to development of sites and that they consider a broad range of factors that are relevant to this objective. Significant positive effects are identified in relation to SO1: 'Town Centres' and SO2: 'Neighbourhoods.'

5.6.5 Policy BFN1 sets out the spatial strategy for increasing employment and economic activity in the borough. A significant positive effect is identified in relation to SO4: 'Employment' and SO5: 'Economic benefits.'

5.6.6 Policy BFN1 identifies the location for new schools. A significant positive effect is identified in relation to SO6: 'Education.'

5.6.7 Policy BFN1 sets out the spatial strategy for delivering a significant amount of housing. A significant positive effect is identified in relation to SO8: 'Housing supply.'



- 5.6.8 Policy BFN1 seeks to deliver the concept of 15-minute neighbourhoods. Policy BFN2 sets out a range of criteria that will contribute to this objective, co-designed masterplanning, meanwhile uses (where required) and post-occupancy surveys. All of these will contribute to the achievement of sustainable design. Significant positive effects are identified in relation to SO10: 'Sustainable design'.
- 5.6.9 Policy BFN1 seeks to optimise the use of land, improve air quality and protect water resources. A significant positive effect is identified in relation to SO11: 'Natural resources'.
- 5.6.10 Policy BFN1 would provide a considerable amount of new open spaces/parks across the proposed strategic sites. A significant positive effect is identified in relation to SO14: 'GBI'.
- 5.6.11 Policy BFN2 would require major applications masterplans to identify how they would provide biodiversity net gain on site. A significant positive effect is identified in relation to SO15: 'Biodiversity'.
- 5.6.12 Policy BFN1 seeks to improve strategic and local connections and increase active travel through the implementation of Low Traffic Neighbourhoods, new bridges over the River Lea and the River Roding, extension of the Lea Valley Walk, Thames Path and Capital Ring and reduce the dominance of the borough's road infrastructure to improve air quality and to enable better walking and cycling. A significant positive effect is identified in relation to SO16: 'Sustainable transport.'
- 5.6.13 Policy BFN1 protects existing community facilities and supports the creation of new facilities. A significant positive effect is identified in relation to SO18: 'Community facilities,' SO19: 'Inclusion,' SO20: 'Young people' and SO22: 'Health and wellbeing.'

## Design – Summary of Significant Effects

- 5.6.14 The policies are:
- D1: Design Standards;
  - D2: Public Realm Net Gain;
  - D3 Design-led residential site capacity optimisation;
  - D4 Tall Buildings;
  - D5 Living Well at High Density;
  - D6 Shopfronts and advertising;
  - D7 Neighbourliness;
  - D8 Conservation Areas and Areas of Townscape Value;
  - D9 Archaeological Priority Areas; and
  - D10 Designated and non-designated buildings, ancient monuments and historic parks and gardens.
- 5.6.15 Policy D7 sets out criteria to ensure that new development does not impact on the liveability and safety of neighbourhoods and a significant positive effect is identified in relation to SO2: 'Neighbourhoods.'
- 5.6.16 Policy D8 sets out the policy approach to Conservation Areas and Areas of Townscape Value. This will help maintain local distinctiveness and protect and enhance place-making assets. Policy D9 sets out the approach to managing development within identified Archaeological Priority Areas. Policy D1 protects designated and non-designated heritage

assets that can contribute to local distinctiveness. Significant positive effects are identified in relation to SO3: Place-making.'

## High Street – Summary of Significant Effects

5.6.17 The policies are:

- HS1 Newham's Town Centres Network;
- HS2 Managing New and Existing Town and Local Centres;
- HS3 Edge-of-Centre and Out-of-Centre Retail, Restaurants, Cafes and Services;
- HS4 Markets and events, pop-up spaces;
- HS5 Visitor Evening and Night Time Economy;
- HS6 Health and Wellbeing on the High Street;
- HS7 Delivery-led businesses; and
- HS8 Visitor Accommodation.

5.6.18 Policy HS5 seeks to develop the evening and night time economy in existing and emerging town centres. A significant positive effect is identified in relation to SO1: 'Town centres.'

5.6.19 Policy HS6 seeks to control uses that can impact on health and wellbeing, including the availability of healthy food and over-concentration of gambling premises and hot food takeaways. A significant positive effect is identified in relation to SO22: 'Health and wellbeing.'

## Community Facilities – Summary of Significant Effects

5.6.20 The policies are:

- CF1: Existing community facilities;
- CF2: New and re-provided community facilities;
- CF3: Cultural and leisure facilities; and
- CF4: Education and childcare facilities.

5.6.21 Policies CF1 to CF3 would contribute significantly to the borough's economy through the preservation and creation of community and leisure facilities, which provides jobs across the borough but would likely also protect/provide employment within town centres. A significant positive effect is identified in relation to SO1: 'Town Centres' and SO5: 'Economic benefits.'

5.6.22 Policy CF1 would result in the retention of buildings that form an important part of the historical and built environments character and setting. A significant positive effect is identified in relation to SO3: 'Place-making.'

5.6.23 The community, leisure and educational facilities created by policies CF1 to CF4 would ensure the communities of the borough have places to meet and learn. Such facilities also often act as hubs for communities, whilst providing important services to them. These policies also require such facilities to be accessible, ensuring all residents of the borough can access them. A significant positive effect is identified in relation to SO2: 'Neighbourhoods', SO18: 'Community facilities' and SO19: 'Inclusion.'

- 5.6.24 Policies CF1 to CF4 would enable the retention, expansion and creation of new community, leisure and educational facilities that would also be used by young people. A significant positive effect is identified in relation to SO6: 'Education' and SO20: 'Young people.'
- 5.6.25 Policy CF2 would ensure community facilities of any size do not generate unacceptable transport and highway impacts. Significant positive effects are identified in relation to SO16: 'Sustainable transport'.
- 5.6.26 Policies CF1 to CF3 would enable the retention, expansion and creation of new community and leisure facilities, allow for the residents of the borough to pursue an active lifestyle and healthy activities. Policy CF4 will help ensure that a range of educational needs are met, which could contribute to improved mental and physical health. Significant positive effects are identified in relation to SO22: 'Health and wellbeing.'

## Economy – Summary of Significant Effects

- 5.6.27 The policies are:
- J1: Employment and growth;
  - J2: New Employment Floorspace;
  - J3: Protecting Employment Floorspace; and
  - J4: Community Wealth Building and Inclusive Growth.
- 5.6.28 Policies J1 to J4 would all seek to create or retain existing economic sites across the borough. The development of new economic sites would create jobs within the borough, including within town centres and other centres of employment/economic activity (industrial centres, commercial centres etc.). The policies also provide some flexibility on the types and scale of employment development that can occur within the borough. A significant positive effect is identified in relation to SO1: 'Town Centres', SO4: 'Employment' and SO5: 'Economic benefits.'
- 5.6.29 Policy J4 would have significant positive effects in relation to SO6: 'Education' and O19: 'Inclusion' because it sets out requirements in relation to the provision of training and employment that will contribute to both objectives.

## Homes – Summary of Significant Effects

- 5.6.30 The policies are:
- H1: Meeting Housing Needs;
  - H2: Protecting and Improving Existing Housing;
  - H3: Affordable Housing;
  - H4: Housing Mix;
  - H5: Build to Rent Housing;
  - H6: Supported and Specialist Housing;
  - H7: Housing for older people;
  - H8: Purpose Built Student Accommodation;
  - H9: Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living;

- H10: Gypsy and Traveller Accommodation; and
  - H11: Housing Design Quality
- 5.6.31 Policy H1 has a significant positive effect in relation to SO2: 'Neighbourhoods' by ensuring that proposals consider a site's context, capacity for growth and existing and planned supporting infrastructure capacity. Policy H2 protects existing neighbourhoods, ensuring that any housing that is lost is replaced on a like for like basis. Policy H4 seeks to provide a range of house types and sizes and a significant positive effect is identified.
- 5.6.32 Policy H2 could have significant positive effects on SO3 'Place-making' by managing proposals for the sub-division of existing housing.
- 5.6.33 Increases in the housing stock associated with Policy H1 provides the opportunity for construction related employment over the lifetime of the Local Plan, together with support to the wider economy associated with increased household expenditure and the potential for significant positive effects in relation to SO4 'Employment' is identified.
- 5.6.34 Policy H8 seeks to ensure that the needs of students requiring accommodation to study in the borough are met, thereby improving their access to education. This includes the provision of affordable accommodation. A significant positive effect is identified in relation to SO6: 'Education.'
- 5.6.35 Policy H1 seeks to meet the London Plan 2021's target and H3 sets out the approach to achieving affordable housing, with an overall target of 50% of housing to be affordable. Policy H4 seeks to provide a range of house types and sizes. Policy H5 seeks to secure a percentage of affordable rented homes or a revenue subsidy. Policy H10 seeks to ensure that the future accommodation needs of the Gypsy and Traveller community are met through the provision of permanent pitches. Significant positive effects in relation to SO8 'Housing supply' are identified.
- 5.6.36 The provision of housing, including affordable housing could help address existing and future poverty and inequality associated with housing provision and Policies H1 to H5 are judged to have a significant positive effect in relation to SO19: 'Inclusion' and SO22 Health and wellbeing.

## Green and Blue Spaces – Summary of Significant Effects

- 5.6.37 The policies are:
- GWS1. Green spaces;
  - GWS2. Water spaces;
  - GWS3. Biodiversity, urban greening, and access to nature;
  - GWS4. Trees and Hedgerows;
  - GWS5. Play and informal recreation for all ages.
- 5.6.38 The potential for significant positive effects has been identified across a number of the Sustainability objectives.
- 5.6.39 Policies GWS1, GWS2, GWS3 and GWS5 could make a significant contribution to SO2 'Neighbourhoods' by ensuring that neighbourhoods are liveable with access to open space. A significant positive effect is also identified in relation to SO19 'Inclusion' as the policies will help ensure access to green and blue infrastructure.

- 5.6.40 All of the policies make a significant positive contribution to SO3 'Place-making' and SO11 'Natural resources' by seeking to protect and enhance existing green and blue infrastructure assets.
- 5.6.41 Policy GWS2 requires suitable setbacks from water space edges to mitigate flood risk and encourages a softer approach to flood management. It also required an integrated approach to water infrastructure to be identified within a Design and Access Statement. A significant positive effect has therefore been identified in relation to SO12 'Flood risk'.
- 5.6.42 Policies GWS1, GWS2, GWS3 and GWS5 could make a significant contribution to SO14 'GBI'.
- 5.6.43 Policies GWS1 to GWS4 could make a significant positive contribution to SO15 'Biodiversity' as they seek to protect and enhance green and blue infrastructure that can contribute to this objective.
- 5.6.44 Policies GWS1, GWS2 and GWS3 could have significant positive effects in relation to SO16 'Sustainable transport.' All of the policies provide opportunities to protect and enhance networks for walking and cycling.
- 5.6.45 Policy GWS5 includes provision for sports and recreation and social interaction which could benefit people of all ages, including young people and a significant positive effect is identified on SO20 'Young people.'
- 5.6.46 Policies GWS1, GWS2, GWS3 and GWS5 could make a significant contribution to the achievement of this objective through the provision of access to the natural environment and opportunities for physical activity. Uncertainties associated with the extent to which existing deficiencies in open space will be addressed are also relevant here. Policy GWS5 also seeks to ensure that play and informal recreational spaces are located to minimise exposure to poor air quality.

## Climate Change – Summary of Significant Effects

- 5.6.47 The policies are:
- CE1: Environmental design and delivery;
  - CE2: Zero Carbon Development;
  - CE3: Embodied Carbon;
  - CE4: Overheating;
  - CE5: Retrofit and Circular Economy;
  - CE6: Air Quality;
  - CE7: Managing Flood Risk; and
  - CE8: Sustainable Drainage.
- 5.6.48 Policy CE2 sets out detailed measures for ensuring that development is net zero carbon. Policy CE3 has detailed measures for reducing embodied carbon in developments. Policy CE4 provides detailed criteria relating to overheating that will help mitigate climate change effects in new developments. Significant positive effects are identified in relation to SO9: Climate change.
- 5.6.49 Policy CE2 sets out detailed measures for ensuring that development is net zero carbon. Policy CE3 has measures for reducing embodied carbon in developments. Significant positive effects in relation to SO10: 'Sustainable design.'

- 5.6.50 Policy CE1 sets out high level principles that development proposals must consider in relation to climate change adaptation and mitigation that could contribute to this objective (see comments under mitigation at SO9). The criteria include a requirement for development to include specific targets for water consumption and a significant positive effect is identified in relation to this element of the policy.
- 5.6.51 Policy CE3 sets out the need to reduce resource use through consideration of embodied carbon across a building's life cycle. Significant positive effects in relation to SO11: 'Natural resources' are identified.
- 5.6.52 Policy CE6 seeks to mitigate and improve Newham's poor air quality. The potential for a significant positive effect is identified in relation to SO11: 'Natural resources'.
- 5.6.53 Policies CE7 and CE8 set out measures to reduce and manage flood risks and significant positive effects are identified in relation to SO12: 'Flood risk'.

## Transport – Summary of Significant Effects

- 5.6.54 The policies are:
- T1: Strategic Transport;
  - T2: Local Transport;
  - T3: Transport Behaviour Change;
  - T4: Servicing a development; and
  - T5: Airport.
- 5.6.55 All of the policies would result in improvements to the borough's infrastructure of the borough, with active and sustainable transport methods being encouraged. This ensures new, accessible developments and jobs can be created within the borough, with developments using new, sustainable and active technology for deliveries or to aid in reducing the effects of the London City Airport. A significant positive effect is identified in relation to SO2: 'Neighbourhoods', SO3: 'Place-making', SO4: 'Employment' and SO16: 'Sustainable transport'.
- 5.6.56 Policies T1 to T4 would ensure developments properly consider their effects on their surroundings in terms of the necessary infrastructure needed to make these developments operational, ensuring nearby educational and other facilities would not be compromised. These policies would also ensure the infrastructure of the borough is better designed and create well designed places. A significant positive effect is identified in relation to SO6: 'Education' and SO10: 'Sustainable design'.
- 5.6.57 Policies T1 to T3 would result in the creation of both large scale and small scale infrastructure that is well designed and seeks to encourage both sustainable and active modes of travel. This would ensure the residents of the borough would be able to traverse the borough using the travel method of their choosing and ensures the services, facilities and communities of the borough and its surroundings are accessible. A significant positive effect is identified in relation to SO18: 'Community facilities'.
- 5.6.58 The policies would aid in improving the health and wellbeing of the borough's residents by reducing the amount of air quality effects they experience improving air quality and ensuring the borough is accessible and traversable through a variety of transportation methods encouraging active forms of travel. A significant positive effect is identified in relation to SO22: 'Health and wellbeing'.



## Waste and Utilities – Summary of Significant Effects

- 5.6.59 The policies are:
- W1: Waste Management Capacity;
  - W2: New or Improved Waste Management Facilities;
  - W3: Waste Management in Developments; and
  - W4: Utilities and Digital Infrastructure.
- 5.6.60 Policy W4 requires proposals for infrastructure and utilities to demonstrate that the spatial, visual, amenity and environmental impacts of utilities infrastructure will be minimised and where feasible reduced, particularly where existing facilities are being expanded or reconfigured. A significant positive effect is identified in relation to SO3 'Place-making'.
- 5.6.61 Policy W4 requires major developments to connect to decarbonised heat networks. A significant positive effect is identified in relation to SO9 'climate change,' contingent on such networks being available. Policy W4 seeks to ensure that infrastructure is resilient to future climate change.
- 5.6.62 Policy W3 seeks to ensure that new developments include facilities to encourage sustainable management of resources and a significant positive effect is identified in relation to SO1~ 'Sustainable design'.
- 5.6.63 Policies W1 to W3 seek to contribute to more sustainable management of resources in accordance with the waste hierarchy and a positive effect is identified. A significant positive effect is identified. The significance of the effect is uncertain given that rates of recycling for household waste in the borough are currently low and waste management is being coordinated across East London. The policies also seek to protect air quality. Policy W4 protects natural resources, e.g. through the management of water and wastewater. Significant positive effects are identified in relation to SO11 'Natural resources'.
- 5.6.64 Policy W4 could make a significant contribution to SO14 'GBI' by ensuring that sufficient infrastructure is provided to manage wastewater and surface water runoff, improving and protecting blue infrastructure.
- 5.6.65 Policies W1 to W3 seek to reduce the amount of waste sent to landfill and to increase the management of waste further up the waste hierarchy. A significant positive effect is identified in relation to SO17 'Reducing waste'.
- 5.6.66 Policy W4 will help ensure that infrastructure has capacity for planned development and is upgraded as necessary. A significant positive effect is identified in relation to SO18 'Community facilities'.

## 5.7 SA of Neighbourhood Policies

5.7.1 The Local Plan identifies 16 neighbourhoods:

- N1 Gallions Reach;
- N2 North Woolwich;
- N3 Royal Victoria;
- N4 Royal Albert North;
- N5 Canning Town & Custom House;
- N6 Manor Road;
- N7 Three Mills;
- N8 Stratford and Maryland;
- N9 West Ham;
- N10 Plaistow;
- N11 Beckton;
- N12 East Ham South;
- N13 East Ham;
- N14 Green Street;
- N15 Forest Gate; and
- N16 Manor Park and Little Ilford.

5.7.2 Appraisal matrices for the policies are provided at **Appendix G**. Significant effects for each neighbourhood are discussed below and summarised in **Table 11**. Recommendations are set out in **Table 5.16**.

**Table 5.11 Neighbourhood Policies Summary Effects**

SA Objectives	N1 Gallions Reach	N2 North Woolwich	N3 Royal Victoria	N4 Royal Albert North	N5 Canning Town & Custom House	N6 Manor Road	N7 Three Mills	N8 Stratford and Maryland	N9 West Ham	N10 Plaistow	N11 Beckton	N12 East Ham South	N13 East Ham	N14 Green Street	N15 Forest Gate	N16 Manor Park and Little Ilford
SO1: 'Town Centres'	++	+	+	?	++	+	+	+	+	+	++	+	+	+	+	+
SO2: 'Neighbourhoods'	++	++	++	++	++	+	++	++	++	++	++	++	++	++	++	++
SO3: 'Place-making'	++	++	++	++	++	+	++	++	++	++	++	++	++	++	++	++
SO4: 'Employment'	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
SO5: 'Economic benefits'	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?
SO6: 'Education'	++	?	++	++/?	+	?	++	++	++	++	++	?	+	+	?	?
SO7: 'Housing stock'	~	~	~	~	+	~	~	~	~	~	~	~	~	~	~	~

SA Objectives	N1 Gallions Reach	N2 North Woolwich	N3 Royal Victoria	N4 Royal Albert North	N5 Canning Town & Custom House	N6 Manor Road	N7 Three Mills	N8 Stratford and Maryland	N9 West Ham	N10 Plaistow	N11 Beckton	N12 East Ham South	N13 East Ham	N14 Green Street	N15 Forest Gate	N16 Manor Park and Little Ilford
SO8: 'Housing supply'	++	++	++	++	++	?	++	++	++	++	++	++/?	++	++	++	?
SO9: 'Climate change'	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SO10: 'Sustainable design'	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
SO11: 'Natural resources'	++/?	++	++	++	++	++/?	++/?	++/?	++/?	++	++	++/?	++	++/?	++	++/?
SO12: 'Flood risk'	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~
SO13: 'Land quality'	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
SO14: 'GBI'	++	+	++	++	++	+	++	++	++	++	++	++	++	++	++	++
SO15: 'Biodiversity'	++/?	+	++/?	++	++	+	++/?	++/?	++	++/?	++/?	++/?	++/?	++/?	++/?	++/?
SO16: 'Sustainable'	++	++	++	++	++	++	++	++/?	++	++	++	++	++	++	++	++

SA Objectives	N1 Gallions Reach	N2 North Woolwich	N3 Royal Victoria	N4 Royal Albert North	N5 Canning Town & Custom House	N6 Manor Road	N7 Three Mills	N8 Stratford and Maryland	N9 West Ham	N10 Plaistow	N11 Beckton	N12 East Ham South	N13 East Ham	N14 Green Street	N15 Forest Gate	N16 Manor Park and Little Ilford
transport																
SO17: 'Reducing waste'	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~
SO18: 'Community facilities'	++	++	++	++	++	?	++	++	++	++	++	++	++	++	++	++
SO19: 'Inclusion'	++	++	++	++	++	+	++	++	++	++	++	++	++	++	++	++
SO20: 'Young people'	++	++	++	++	++	+	++	++	++	++	++	++	++	++	++	++
SO21: 'Reducing crime'	~	~	~	~	+	~	~	~	~	~	~	~	~	~	~	~
SO22: 'Health and wellbeing'	++	++	++	+	++	+	++	++	+	++	++	?	0	+	++	+

## N1 Gallions Reach Neighbourhood – Summary of Significant Effects

- 5.7.3 The policy supports the creation of a new town centre as part of the neighbourhood and a significant positive effect is identified in relation to SO01: 'Town centres'.
- 5.7.4 The neighbourhood will be supported by new community facilities and schools. The neighbourhood will benefit from new green spaces and improved access to existing green spaces and nature and both the River Thames and the River Roding. The new town centre will include a town square. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.5 The policy seeks to integrate and reflect the former gasholders and Victorian river piers as a feature of the neighbourhood's character. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.6 Remaining industrial land will be intensified and continue to attract industrial, utilities, storage and distribution uses. Retail, food and drink and business and service uses, community and cultural facilities and offices will be provided in the town centre, providing increases in employment. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.7 A mix of uses within the neighbourhood, including homes, employment and retail uses could help ensure that economic benefits are retained within the borough, making a significant positive effect in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.8 The policy requires a secondary school and a primary school in close proximity to Atlantis Avenue and Armada Way. Extension of the DLR could also help improve accessibility to further and higher education and a significant positive effect is identified in relation to SO6: 'Education'.
- 5.7.9 The policy will contribute to the planning policy framework for a strategic development with potential for a strategic development at Beckton Riverside and a significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.10 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.11 The policy also has a significant positive effect in relation to SO14: 'GBI' as it seeks to implement a range of measures, including improved access to existing MoL, extension of the Greenway and the Thames Path. A significant positive effect is identified.
- 5.7.12 A significant positive effect is identified in relation to SO15: 'Biodiversity' as the policy seeks to retain existing mature trees and maximise the provision of new open space and green infrastructure and identify opportunities to increase biodiversity and improve existing SINC's.
- 5.7.13 The policy identifies a range of measures to support SO16: 'Sustainable transport'. Measures include an extension of the DLR with a new station at Beckton Riverside, a Thames Clipper Pier, increase the accessibility of the River Roding and measures to enable walking and cycling. A significant positive effect is identified.
- 5.7.14 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment, health and education facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion,' SO20: 'Young people' and SO22: 'Health and wellbeing' are identified.



## N2 North Woolwich Neighbourhood – Summary of Significant Effects

- 5.7.15 The policy identifies the need for local scale community facilities, including new health facilities. The policy also supports improved public realm, open spaces and connectivity. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.16 The policy supports development that conserves the character of the neighbourhood's Areas of Townscape Value and other heritage assets, including the locally listed former police station and the Royal Standard pub. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.17 The policy requires developments in the Royal Docks Enterprise Zone which deliver new employment floor space to support the London Living Wage designation. It also supports the intensification of the neighbourhood's industrial land, particularly for small and medium enterprises, green and low carbon industries and low-cost industrial space. The policy also supports the refurbishment of the former Tate Institute to provide a community facility and/or affordable workspace for small and medium enterprises and cultural and creative industries. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.18 Encouraging a mix of uses within the neighbourhood, including homes, employment and retail uses could help ensure that economic benefits are retained within the borough, making a significant positive effect in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.19 It is assumed that the policy will contribute to this objective by helping to bring forward two strategic sites and enabling development elsewhere in the neighbourhood. A significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.20 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.21 The policy identifies a range of measures to support SO16: 'Sustainable transport'. Measures include mitigation of the severance caused by train tracks, including through the provision of new bridges for walking and cycling from Thames Road to Hartmann Road and Factory Road to Albert Road.
- 5.7.22 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment, health facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion,' SO20: 'Young people' and SO22: 'Health and wellbeing' are identified.

## N3 Royal Victoria Neighbourhood – Summary of Significant Effects

- 5.7.23 The policy supports new and enhanced leisure, tourism and visitor economy uses of an appropriate type, while mitigating impacts on residential amenity, education facilities and a health facility. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.24 The policy encourages development that conserves the character of the neighbourhood's heritage assets, heritage assets include Silo D, Millennium Mills, the Silvertown War memorial, the Stothert and Pitt Cranes and Victorian era warehouse buildings such as Warehouse K. The policy also encourages development to respond to the materials and detailing of the neighbourhood and the traditional warehouse architecture. A significant positive effect is identified in relation to SO3: 'Place-making'.

- 5.7.25 The policy supports the intensification of industrial land, new workspaces in the area and seeks to manage the transition between industrial and non-industrial uses. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.26 A mix of uses within the neighbourhood, including homes, employment, tourism and retail uses could help ensure that economic benefits are retained within the borough, making a significant positive effect in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.27 The policy requires the provision of primary schools at N3.SA1 Silvertown Quays, and N3.SA3 Connaught Riverside and at Thames Wharf N3.SA4 Thameside West and a significant positive effect is identified in relation to SO6: 'Education'.
- 5.7.28 The policy contributes to the policy framework for the development of four strategic sites within the neighbourhood that will deliver a significant amount of housing and a significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.29 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.30 The policy has a significant positive effect in relation to SO14: 'GBI' relevant measures include the extension of Lyle Park and a new park at Thames Wharf.
- 5.7.31 The policy requires development to retain existing mature trees and maximise the provision of new open space and green infrastructure and the opportunities to increase biodiversity, including the extension of Lyle Park and a new park at Thames Wharf and Silvertown Quays, whilst taking account of the London City Airport biodiversity guidance. A significant positive effect is identified in relation to SO15: 'Biodiversity'.
- 5.7.32 The policy identifies a range of measures to support SO16: 'Sustainable transport'. Measures include improvements to existing DLR stations and requiring a new DLR station as part the redevelopment of Thameside West and the creation of a high quality public realm and walking and cycling routes.
- 5.7.33 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment, health and education facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion,' SO20: 'Young people' and SO22: 'Health and wellbeing' are identified.

#### **N4 Royal Albert North Neighbourhood – Summary of Significant Effects**

- 5.7.34 The policy supports improvements to the University of East London campus and re-use of the Compressor House for cultural and community uses. The policy requires improvements to access to public transport and the wider network of neighbourhoods and their green spaces and maximise the provision of new open space and green infrastructure. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.35 The assets in the area include Compressor House, the Central Buffet at Custom House, the Dock's Manager's Offices and Gallions Hotel. The policy supports the re-use of Compressor House for cultural and community uses. The policy also encourages development to respond to the materials and detailing of the neighbourhood and the traditional warehouse architecture. A significant positive effect is identified in relation to SO3: 'Place-making'.

- 5.7.36 A significant positive effect is identified in relation to SO4 'Employment' as the policy includes a range of requirement in relation to employment, for example: the policy requires development to address gaps within the 15-minute network of employment uses through the delivery of a wide range of employment uses, particularly for smaller flexible industrial and office workshops for small and medium enterprises and micro businesses. The policy also requires the intensification of industrial land to deliver a strategic scale boatyard and new workspaces and skills and training opportunities at Albert Island.
- 5.7.37 A mix of uses within the neighbourhood, including homes, employment and retail uses could help ensure that economic benefits are retained within the borough. A significant positive effect is identified in relation to SO5: 'Economic benefits'.
- 5.7.38 The policy supports growth in training and economic opportunities for green and low carbon industries and encouraging developments to establish strong links with University of East London to support skills, training and career development. It also supports improvements to the University of East London Campus. A significant positive effect is identified in relation to SO6: 'Education'.
- 5.7.39 The policy contributes to the policy framework for the development of one strategic site within the neighbourhood that will deliver a significant amount of housing and a significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.40 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land and buildings. The policy requires development to improve air quality and reduce exposure to poor air quality, particularly along Connaught Bridge, Royal Albert Way and Woolwich Manor Way. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.41 The policy has a significant positive effect in relation to SO14: 'GBI' relevant measures include requiring enhancement to conditions for walking, cycling and buses and to improve access to public transport and the wider network of neighbourhoods and their green spaces and provision of new open space and green infrastructure.
- 5.7.42 The policy contributes to SO15: 'Biodiversity' by requiring development to retain existing mature trees and maximise the provision of new open space and green infrastructure and the opportunities to increase biodiversity, particularly on sites along Royal Albert Way, whilst taking account of the London City Airport biodiversity guidance.
- 5.7.43 The policy identifies a range of measures to support SO16: 'Sustainable transport'. Measures include requiring enhancement to conditions for walking, cycling and buses and to improve access to public transport and the wider network of neighbourhoods and their green spaces and requiring new crossings at Royal Albert Way and Gallions Reach Roundabout to reduce severance to improve connectivity to the wider network of neighbourhoods.
- 5.7.44 Development provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment, enhanced higher education facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion' and SO20: 'Young people'.

## **N5 Canning Town & Custom House Neighbourhood – Summary of Significant Effects**

- 5.7.45 The policy includes measure to improve Canning Town District Centre and Custom House Local Centre. A significant positive effect is identified in relation to SO1: 'Town Centres'.
- 5.7.46 The policy seeks to maintain and enhance the role of the district and local centres in the neighbourhood. Proposals also include a cultural, heritage and learning space in the

former Canning Town Library. A significant positive effect is identified in relation to SO2: 'Neighbourhoods.'

- 5.7.47 Proposals also include a cultural, heritage and learning space in the former Canning Town Library, a listed Grade II building. The policy also supports development that conserves the character of the Canning Town Area of Townscape Value and other heritage assets. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.48 The policy seeks to protect existing and deliver new small scale employment floorspace to increase local economic opportunities as part of the 15 minute neighbourhood network of employment uses. A significant positive effect is identified in relation to SO4: 'Employment'.
- 5.7.49 A mix of uses within the neighbourhood, including homes, employment and retail uses could help ensure that economic benefits are retained within the borough. A significant positive effect is identified in relation to SO5: 'Economic benefits'.
- 5.7.50 There is opportunity for a significant increase in housing within the neighbourhood, including the provision of affordable housing. A significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.51 The policy encourages the re-use of land and buildings within the area and encourages development to improve air quality and reduce exposure to poor air quality, particularly in the Air Quality Focus Areas and along Victoria Dock Road, Newham Way, Prince Regent Lane, Freemasons Road, Manor Road and Hermit Road. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.52 The policy makes a significant positive contribution to the achievement of SO14: 'GBI' relevant measures include supporting a new park at Limmo and improved access to the River Lea.
- 5.7.53 The policy requires development to retain existing mature tree and maximise the provision of new open space and green infrastructure and the opportunities to increase biodiversity, including the provision of a new park at Limmo. A significant positive effect is identified in relation to SO15: 'Biodiversity'.
- 5.7.54 The policy identifies a range of measures to support SO16: 'Sustainable transport'. Measures include supporting the reconfiguration of Silvertown Way and enhancing conditions for walking, cycling and public transport and to improve links to the water, the Royal Docks, Custom House station and Prince Regent station along key routes.
- 5.7.55 The policy seeks to broaden the function of Canning Town district centre, ensuring it meets the need for community facilities. Custom House will benefit from new and improved housing and public transport access, supported by a renewed local centre, community facilities and a new health facility. Significant positive effects in relation to SO19: 'Inclusion,' SO20: 'Young people' and SO22: 'Health and wellbeing' are identified.

## **N6 Manor Road Neighbourhood – Summary of Significant Effects**

- 5.7.56 The policy would intensify existing industrial sites within the neighbourhood and support an increase in the supply of modern industrial units. It also would allow for appropriate development for the new Bidder Street Local Mixed Use Area and British Gas / Cody Road Strategic Industrial Location Designations to support the delivery of heavier industrial uses. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.57 The provision for a range of industrial employment within the neighbourhood would help ensure economic benefits are retained within it. Uncertainties around the extent to which

economic benefits will be retained within the borough. A significant positive effect is identified in relation to SO5: 'Economic benefits'.

- 5.7.58 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land. The policy also requires development to improve air quality and reduce exposure to poor air quality, particularly along Manor Road. It also ensures that development has to mitigate any impacts of noise, dust, smell and industrial vehicular traffic. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.

## **N7 Three Mills Neighbourhood – Summary of Significant Effects**

- 5.7.59 The neighbourhood will be supported by new community facilities. The neighbourhood will benefit from improved access to the water and natural environment. Access to existing green space will be improved, with previously inaccessible river channels being made accessible. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.60 The policy seeks to retain the historic identity of the neighbourhood and its historic waterfront and views. The policy also seeks to conserve the character of the Three Mills and Sugar House Lane Conservation Areas and supports the restoration of heritage buildings. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.61 Remaining industrial land will be intensified and continue to attract industrial, utilities particularly those serving the CAZ. New flexible light industrial workspaces suitable for micro-businesses and small and medium enterprises would be encouraged at Parcelforce specifically. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.62 A mix of uses within the neighbourhood, comprising of homes (including residential moorings), employment and retail uses, which could help ensure that economic benefits are retained within the borough. A significant positive effect is identified in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough. A significant positive effect is also identified in relation to SO8: 'Housing'.
- 5.7.63 The policy would support the creation of the N7.SA2 Parcelforce site, which would provide a secondary school. A significant positive effect is identified in relation to SO6: 'Education'.
- 5.7.64 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land. The policy further requires any development to improve air quality and reduce exposure to poor air quality, especially within the Air Quality Focus Area and along High Street and Manor Road. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.65 The policy also has a significant positive effect in relation to SO14: 'GBI' as it seeks to implement a range of measures, including the creation of green infrastructure and open spaces and their improvement, including Parks at the Abbey Mills and Parcelforce sites and increasing the accessibility of the water environment and river channels. A significant positive effect is identified.
- 5.7.66 A significant positive effect is identified in relation to SO15: 'Biodiversity' as the policy seeks to retain existing mature trees and maximise the provision of new open space and green infrastructure and identify opportunities to increase biodiversity and improve existing SINCS.
- 5.7.67 The policy identifies a range of measures to support SO16: 'Sustainable transport'. Measures include the creation of new walking and cycling routes and the improvement of



existing walking and cycling routes (especially the Greenway and the Leeway), reduce the severance of the neighbourhood through the provision of new infrastructure and bridges and improving the legibility and safety of the neighbourhood for walkers and cyclists.

- 5.7.68 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of housing, employment, and community facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion' and SO20: 'Young people' are identified.
- 5.7.69 The policy supports the delivery of the Parcellforce site, which would provide a health facility and the policy would also encourage an active/healthy lifestyle. Significant positive effects are identified in relation to SO22: 'Health and wellbeing'.

## **N8 Stratford and Maryland Neighbourhood – Summary of Significant Effects**

- 5.7.70 The neighbourhood will be supported by new community facilities and schools. The neighbourhood will benefit from new green spaces and improved access to existing green spaces and nature. The policy also seeks to create new open spaces within the neighbourhood. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.71 Stratford Metropolitan Centre is partly located within a Conservation Area and the Stratford St John Conservation Area also exists within this neighbourhood. The policy requires these Conservation Areas to be protected and for the Listed Buildings of the neighbourhood to be conserved. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.72 Remaining employment land will be intensified and continue to attract a wide range of uses. Retail, food and drink and business and service uses, community and cultural facilities and offices will be provided in the town/local centres, providing increases in employment. The policy seeks to create an Innovation Quarter around Stratford High Street DLR station. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.73 A mix of uses within the neighbourhood, including homes, employment and retail uses could help ensure that economic benefits are retained within the borough, making a significant positive effect in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.74 The policy requires the creation of a new Special Educational Needs and Disabilities school at Rick Roberts Way. The policy supports the creation of new educational facilities. The accessibility/infrastructure improvements contained within the policy would increase the accessibility of all educational facilities and a significant positive effect is identified in relation to SO6: 'Education'.
- 5.7.75 The policy encourages the provision of housing within the neighbourhood and could provide a significant amount of housing by assisting with the regeneration of the Carpenter Estate and a significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.76 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land and the re-provisioning of a waste management facility. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.



- 5.7.77 The policy also has a significant positive effect in relation to SO14: 'GBI' as it seeks to implement a range of measures, including improving existing greenways, open space and infrastructure, creation of new infrastructure open spaces and greenways and the reduction of severance experienced across the neighbourhood. A significant positive effect is identified.
- 5.7.78 A significant positive effect is identified in relation to SO15: 'Biodiversity' as the policy seeks to retain existing mature trees and maximise the provision of new open space and green infrastructure and identify opportunities to increase biodiversity and improve existing SINC's.
- 5.7.79 The policy identifies a range of measures to support SO16: 'Sustainable transport.' Measures include minimising car use, improvements to walking and cycling networks, improving capacity and reducing congestion at Stratford station and improved bridge connections over the River Lea and at Stratford Station. A significant positive effect is identified.
- 5.7.80 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment, health and education facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion,' SO20: 'Young people' and SO22: 'Health and wellbeing' are identified.

## N9 West Ham Neighbourhood – Summary of Significant Effects

- 5.7.81 The neighbourhood will benefit from additional childcare facilities and new green spaces and improved access to existing green spaces and nature. The policy also seeks to create new open spaces within the neighbourhood. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.82 The policy seeks to conserve the many heritage assets within it, especially their character and setting. The policy places particular importance on the conservation of the Stratford Langthorne Abbey (Scheduled Ancient Monument) and West Ham Park (Historic Park and Garden). A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.83 Remaining employment land will be intensified and continue to attract a wide range of uses. Retail, food and drink and business and service uses, community and cultural facilities will be provided in the town/local centres, providing increases in employment. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.84 A mix of uses within the neighbourhood, including homes and retail uses could help ensure that economic benefits are retained within the borough, making a significant positive effect in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.85 The N9.SA1 Plaistow North site would develop a childcare facility as part of this policy. Therefore, a significant positive effect is identified in relation to SO6: 'Education'.
- 5.7.86 The policy encourages the provision of housing within the neighbourhood and could provide a large amount of housing through the development of one allocation. A significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.87 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land and contains a requirement to protect air quality. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.88 The policy also has a significant positive effect in relation to SO14: 'GBI' as it seeks to implement a range of measures, including improving existing greenways, open space and

infrastructure, creation of new infrastructure open/green/blue spaces and greenways and the greening of existing walkways and cycleways. A significant positive effect is identified.

- 5.7.89 A significant positive effect is identified in relation to SO15: 'Biodiversity' as the policy seeks to retain existing mature trees and maximise the provision of new open space and green infrastructure and identify opportunities to increase biodiversity and improve existing SINCs.
- 5.7.90 The policy identifies a range of measures to support SO16: 'Sustainable transport.' Measures include improving access to the Greenway, improving walking and cycle routes (especially in identified locations), greening existing walking and cycling ways within the neighbourhood and increase the accessibility of public transport. A significant positive effect is identified.
- 5.7.91 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment and health facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion,' and SO20: 'Young people'.

## **N10 Plaistow Neighbourhood – Summary of Significant Effects**

- 5.7.92 The policy identifies the need for local scale community facilities, including the expansion/improvement of health and leisure facilities. The policy also supports improved public realm, open spaces and connectivity. A significant positive effect is identified in relation to SO2: 'Neighbourhoods', SO18 'Community facilities' and SO22 'Health and wellbeing'.
- 5.7.93 The policy supports development that conserves the neighbourhoods Listed Buildings. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.94 The policy would support the refurbishment of 31 – 35 Stock Street to provide affordable workspace, alongside encouraging retail, food and drink and business and service uses, community and cultural facilities and offices uses, which all provides increases in employment. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.95 Encouraging a mix of uses within the neighbourhood, including homes, employment and retail uses could help ensure that economic benefits are retained within the borough, making a significant positive effect in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.96 The policy allows for improvement to Newham 6<sup>th</sup> Form College and would enable a childcare facility. A significant positive effect is identified in relation to SO6: 'Education'.
- 5.7.97 It is assumed that the policy will contribute to this objective by helping to bring forward three strategic sites and enabling development elsewhere in the neighbourhood. A significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.98 The policy would result in development that will include the re-use of other areas of previously developed land and for development to improve air quality and reduce exposure to poor air quality, particularly in the Air Quality Focus Areas and along the A112 and Balaam Street. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.99 The policy also has a significant positive effect in relation to SO14: 'GBI' as it seeks to implement a range of measures, including the creation of green infrastructure and open spaces and their improvement and improving the accessibility of the Greenway. A significant positive effect is identified.

- 5.7.100 A significant positive effect is identified in relation to SO15: 'Biodiversity' as the policy seeks to retain existing mature trees and maximise the provision of new open space and green infrastructure.
- 5.7.101 The policy identifies a range of measures to support SO16: 'Sustainable transport.' Measures include the creation of new walking and cycling routes and the improvement of existing walking and cycling routes (especially the Greenway, Barking Way and others) and therefore a significant positive effect is identified.
- 5.7.102 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment, health and education facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion' and SO20: 'Young people' are identified.

## **N11 Beckton Neighbourhood – Summary of Significant Effects**

- 5.7.103 The policy supports the re-configuration and diversification of the town centre in accordance with N11.SA1 East Beckton town centre and would therefore have a significant positive effect on SO1: 'Town Centres'.
- 5.7.104 The neighbourhood will be supported by new community facilities and schools. The neighbourhood will benefit from new green spaces and improved access to existing green & blue spaces and nature (through the implementation of the Beckton Parks Masterplan). A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.105 The policy seeks to conserve the character and setting of the Winsor Terrace Area of Townscape Value and other heritage assets (i.e. Scheduled Monument WW2 anti-aircraft emplacement in Beckton District Park). A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.106 The policy would provide considerable opportunities for new employment by allowing for the expansion and intensification of existing employment providers across the neighbourhood, especially within its centres and existing employment areas (industrial/retail/leisure parks). A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.107 A mix of uses within the neighbourhood, including homes, employment and retail uses could help ensure that economic benefits are retained within the borough, making a significant positive effect in relation to SO5: 'Economic benefits.' There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough. A significant positive effect is also identified in relation to SO8: 'Housing'.
- 5.7.108 The policy would increase the accessibility of the neighbourhood, through the implementation of the Beckton Parks Masterplan, accessibility of the Greenway and a need for safe and accessible green routes within the neighbourhood. This would result in increasing the accessibility of existing education facilities and the policy also requires the delivery of a new SEND educational facility at Royal Road. A significant positive effect is identified in relation to SO6: 'Education'.
- 5.7.109 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land. The policy also requires development to improve air quality and reduce exposure to poor air quality, particularly in the Air Quality Focus Area and along Prince Regent Lane, Newham Way, Tollgate Road, Stansfield Road, Woolwich Manor Way and Royal Docks Road. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.

- 5.7.110 The policy would require the extensive improvement of the neighbourhoods green and blue infrastructure network, especially at Newham Way and Prince Regent Lane and through the implementation of the Beckton Parks Masterplan. A significant positive effect is identified in relation to SO14: 'GBI' and SO16: 'Sustainable transport'.
- 5.7.111 The policy requires development to retain existing mature trees and maximise the provision of new open space and green infrastructure and the opportunities to increase biodiversity. The policy identifies the opportunity to secure public access to green and blue spaces and nature through walking and cycling. A significant positive effect is identified in relation to SO15: 'Biodiversity'.
- 5.7.112 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment, and education facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion,' and SO20: 'Young people'.
- 5.7.113 Site N11.SA1 East Beckton Town Centre as part of this policy would provide a health facility, with the policy itself also encouraging a more active/healthy lifestyle. A significant positive effect is therefore identified in relation to SO22: 'Health and wellbeing'.

## **N12 East Ham South Neighbourhood – Summary of Significant Effects**

- 5.7.114 The policy requires for local centres to have a diverse mix of uses in the local centres, including local retail, food and drink and business and service uses, community and cultural facilities. The policy would also improve the accessibility of the neighbourhood through walking and cycling improvements. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.115 The policy would protect the heritage assets of the neighbourhood, especially the important heritage assets at/within Areas of Townscape Value on Cheltenham Gardens, Henniker Gardens and Rancliffe Road. Development would also be required to be in accordance with the historical terrace character of the area. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.116 The policy would create employment opportunities through encouraging a diverse mix of uses in the local centres, including local retail, food and drink and business and service uses, community and cultural facilities. The policy also encourages the intensification of the warehousing and distribution industrial development located in the east of the neighbourhood. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.117 It is assumed that the policy will contribute to this objective by helping to enable housing development within the neighbourhood. A significant positive effect is identified in relation to SO8: 'Housing supply,' with some uncertainty as the policy does not include any site allocations.
- 5.7.118 The policy would intensify industrial development within the neighbourhood, utilising previously developed land. It also ensures development improves air quality and reduce exposure to poor air quality, particularly in the Air Quality Focus Areas and along High Street South, Lonsdale Avenue, Boundary Road and the North Circular Road. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.119 The policy seeks to implement a range of measures, including improved access to green/open spaces, provision of green infrastructure and reducing traffic and severance within the neighbourhood. The policy also seeks to improve access to the River Roding. A significant positive effect is identified in relation to SO14: 'GBI' and SO16: 'Sustainable transport'.

- 5.7.120 The policy requires developments to retain existing mature trees and maximise the provision of new open space and green infrastructure and the opportunities to increase biodiversity, alongside increasing the accessibility of existing open spaces and green infrastructure. A significant positive effect is identified in relation to SO15: 'Biodiversity'.
- 5.7.121 The policy would aid in improving public transport and the accessibility of the neighbourhood, reducing severance, and also providing community facilities for all residents of the neighbourhood. It would also create mixed-use developments that combined housing, employment and community uses. Significant positive effects in relation to SO19: 'Inclusion' and SO20: 'Young people' are identified.

### **N13 East Ham Neighbourhood – Summary of Significant Effects**

- 5.7.122 The policy encourages the enhancement of East Ham town centre and East Ham Primark. A new supermarket and other development is supported within the Primary Shopping Area. A significant positive effect is identified in relation to SO1: 'Town Centres'.
- 5.7.123 The policy identifies the need for community facilities and services within East Ham town centre to contribute towards its specialised character area. The policy also seeks to ensure a range of retail and community facilities are delivered within and across the neighbourhood. The policy also seeks to improve the accessibility of these services through better public transport provision, walking and cycle routes and Low Traffic Neighbourhoods. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.124 The policy requires the heritage assets of the neighbourhood to be conserved and enhanced, with the neighbourhood's character being enhanced. The policy also required the East Ham Conservation Area to be conserved and enhanced, and for historic shop fronts and terraced streets to be conserved and their character maintained. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.125 The policy seeks to provide employment within the neighbourhood through encouraging retail and community developments. It also seeks to create office development for small to medium enterprises and Micro Businesses. A significant positive effect is identified in relation to SO4 'Employment.'
- 5.7.126 A mix of uses within the neighbourhood, including homes, employment and retail uses could help ensure that economic benefits are retained within the borough, making a significant positive effect in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.127 It is assumed that the policy will contribute to this objective by helping to bring forward three strategic sites and enabling development elsewhere in the neighbourhood. A significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.128 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land. The policy also requires development to improve air quality and reduce exposure to poor air quality, particularly in the Air Quality Focus Area and along the North Circular Road, Ron Leighton Way, High Street South and High Street North. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.129 The policy seeks to implement a range of measures, including improved access to green/open spaces, provision of green infrastructure and reducing traffic neighbourhood. It also seeks to encourage the creation of '15 minute neighbourhoods' and improve access to East Ham station. The policy also seeks to provide new access ways within the



neighbourhood to provide access to currently obstructed green/blue infrastructure and access to the River Roding . A significant positive effect is identified in relation to SO14: 'GBI' and SO16: 'Sustainable transport'.

- 5.7.130 The policy requires developments to retain existing mature trees and maximise the provision of new open space and green infrastructure and the opportunities to increase biodiversity, alongside increasing the accessibility of existing open spaces and green infrastructure. A significant positive effect is identified in relation to SO15: 'Biodiversity'.
- 5.7.131 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment, and community facilities and enhanced accessibility. Employment opportunities and enhanced transport connections could also benefit young people. Significant positive effects in relation to SO19: 'Inclusion,' and SO20: 'Young people'.

## **N14 Green Street Neighbourhood – Summary of Significant Effects**

- 5.7.132 Policy seeks the creation of a new health centre at Queen's Market Site and at Shrewsbury Road Health Complex Site, alongside new community facilities and retail floorspace. The neighbourhood would also benefit from accessibility improvements and more open/green spaces. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.133 The policy requires development to conserve the neighbourhood's heritage assets and their character and setting. This would protect the neighbourhoods important Listed Buildings such as the Church of St Anthony and monastery, the Red House and the Duke of Fife public house. The policy only supporting development that conserves the neighbourhood's heritage assets through form, materials, detail and landscaping. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.134 The policy would create a range of employment opportunities (retail and leisure) within the neighbourhood, especially within Queen's Market (workspaces). A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.135 A mix of uses within the neighbourhood would be encouraged, comprised of homes, employment, and retail uses, which could help ensure that economic benefits are retained within the borough. A significant positive effect is identified in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.136 It is assumed that the policy will contribute to this objective by helping to bring forward a strategic site and enabling development elsewhere in the neighbourhood. A significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.137 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land. The policy also requires development to improve air quality and reduce exposure to poor air quality, particularly in the Air Quality Focus Area and along Green Street, Katherine Road, Plashet Grove and Plashet Road and Upton Lane. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.138 The policy seeks to implement a range of measures, including the creation of green infrastructure and open spaces and their improvement and increasing the accessibility of Upton Park station and the greening of existing walking and cycling routes. A significant positive effect is identified for SO14: 'GBI' and SO16: 'Sustainable transport'.
- 5.7.139 The policy requires development to retain existing mature trees, maximise the provision of new open space and green infrastructure and the opportunities to increase biodiversity,



particularly through street greening on the neighbourhood's main walking and cycling routes, particularly Green Street, Plashet Road, Plashet Grove, Katherine Road and St George's Road. The policy also identifies the opportunity for new open spaces to be created within the neighbourhood. A significant positive effect is identified for SO15: 'Biodiversity'.

- 5.7.140 The policy would ensure the neighbourhood has new housing and employment opportunities created within it that are accessible by a range of transportation methods and are suitable for a range of ages. Significant positive effects in relation to SO19: 'Inclusion' and SO20: 'Young people' are identified.
- 5.7.141 Both of the options for site N14.SA1 Queen's Market as part of this policy would cause the creation of a new health facility and a health facility would also be provided at Shrewsbury Road Health Complex Site. A significant positive effect in relation to SO22: 'Health and wellbeing' is identified.

## **N15 Forest Gate Neighbourhood – Summary of Significant Effects**

- 5.7.142 The policy identifies the need for a new health facility (expansion of Lord Lister Health Centre) and new retail and leisure uses in the centre. The policy also supports improved public realm, open spaces and connectivity. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.143 The policy requires the conservation of the Woodgrange Conservation Area and the neighbourhoods Areas of Townscape Value and other heritage assets. Developments within the neighbourhood would need to be designed to use sympathetic form, materials, detail and landscaping. Development within the Forest Gate town centre would have to be designed in accordance with its heritage characteristics. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.144 The policy would ensure new employment opportunities are created within the neighbourhood and within its existing economic centres and town centre. It would provide employment which would range from industrial to retail opportunities. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.145 The policy would create mixed use development, comprised of homes, employment and retail uses, which could help ensure that economic benefits are retained within the borough. A significant positive effect is identified in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.146 It is assumed that the policy will contribute to this objective by helping to bring forward two strategic sites and enabling development elsewhere in the neighbourhood. A significant positive effect is identified in relation to SO8: 'Housing supply'.
- 5.7.147 Development will include intensification of existing employment areas and the re-use of other areas of previously developed land and buildings, which the policy seeks to bring back into use. The policy also requires development to improve air quality and reduce exposure to poor air quality, particularly in the Air Quality Focus Area and along Woodgrange Road, Upton Lane and Romford Road. A significant positive effect is also identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.148 The policy would ensure that the neighbourhood benefits from the expansion of its greenways, open spaces, and blue spaces. It would also provide considerable improvement to targeted streets to improve their pedestrianisation, alongside the policy improving the provision and accessibility of public transport within the neighbourhood. A significant positive effect for SO14: 'GBI' and SO16: 'Sustainable transport'.

- 5.7.149 The policy requires development to retain existing mature trees and maximise the provision of new open space and green infrastructure and identify opportunities to increase biodiversity. The policy also seeks to provide new open spaces, green the neighbourhood's pathways and provide access to more green infrastructure and blue spaces. A significant positive effect is identified in relation to SO15: 'Biodiversity'.
- 5.7.150 Development of this scale provides a significant opportunity to help address poverty within the borough through the provision of affordable housing, employment and health facility and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion,' SO20: 'Young people' and SO22: 'Health and wellbeing' are identified.

## **N16 Manor Park and Little Ilford Neighbourhood – Summary of Significant Effects**

- 5.7.151 The policy supports refurbishment of the Jack Cornwell Centre to provide a community hub and a new leisure facility (Manor Park Community Fitness Centre). The policy also supports improved public realm, open spaces and connectivity. A significant positive effect is identified in relation to SO2: 'Neighbourhoods' and SO18 'Community facilities'.
- 5.7.152 The policy would conserve the Durham Road Conservation Area and the neighbourhood's Areas of Townscape Value and any other heritage assets located within the neighbourhood. New developments are required to be designed to be sympathetic in terms of their form, materials, detailing and landscape. A significant positive effect is identified in relation to SO3: 'Place-making'.
- 5.7.153 The policy requires the creation of new employment uses and intensifying existing uses at Kudhail Industrial Estate and Aldersbrook Local Mixed Use Areas and Grantham Road Local Industrial Location. The policy would also support a mix of employment across the neighbourhood. A significant positive effect is identified in relation to SO4 'Employment'.
- 5.7.154 A mix of uses within the neighbourhood would be encouraged, comprised of homes, employment and retail uses, which could help ensure that economic benefits are retained within the borough. A significant positive effect is identified in relation to SO5: 'Economic benefits'. There are uncertainties around the extent to which economic benefits, including spending will be retained within the borough.
- 5.7.155 The policy requires development to improve air quality and reduce exposure to poor air quality, particularly in the Air Quality Focus Area and along Station Road and the North Circular Road. It also seeks to develop the Ilford Garden Junction scheme to enable better access to public transport and for the use of previously developed land. A significant positive effect is identified in relation to SO11: 'Natural resources' and SO13: 'Land quality'.
- 5.7.156 The policy would provide a wide range of improvements to the green infrastructure and open spaces of the neighbourhood. It would also require the improvement to the pedestrianisation and cycling accessibility of certain key streets, alongside the creation of new open spaces, improving the accessibility of the River Roding and a reduction in the levels of severance experienced within the neighbourhood. A significant positive effect is identified in relation to SO14: 'GBI' and SO16: 'Sustainable transport'.
- 5.7.157 The policy requires development to retain existing mature trees and maximise the provision of new open space and green infrastructure and identify opportunities to increase biodiversity and reduce the severance caused by railway tracks. The policy also seeks to green the existing main walkways and cycleways of the neighbourhood. A significant positive effect is identified in relation to SO15: 'Biodiversity'.

- 5.7.158 Development of this scale provides a significant opportunity to help address poverty and provide opportunities for young people within the borough through the provision of affordable housing, employment, health and community facilities and enhanced accessibility. Significant positive effects in relation to SO19: 'Inclusion,' SO20: 'Young people' are identified.

## 5.8 Site Allocations and consideration of reasonable alternatives

### Overview

- 5.8.1 **Section 4.3** sets out the Council's approach to the identification of potential sites.
- 5.8.2 The Council identified 44 sites that it considered to be potentially suitable for allocation in the draft Local Plan because they were suitable, deliverable and would contribute to the objectives of the Local Plan. This section summarises the assessment of these sites with **Appendix H** providing more detail.
- 5.8.3 The identified sites are listed in **Table 5.12** below. The table also indicates those sites that are currently allocated in the Adopted Local Plan or carried forward from the LLDC Local Plan:

**Table 5.12 Identified sites**

Reference number	Name	Current Newham Local Plan Name or LLDC Local Plan Name (*)
N1.SA1	Beckton Riverside	Beckton Riverside
N2.SA1	North Woolwich Gateway	North Woolwich Gateway
N2.SA2	Rymill Street	Rymill Street
N3.SA1	Silvertown Quays	Silvertown Quays
N3.SA2	Lyle Park West	Lyle Park West
N3.SA3	Connaught Riverside	Connaught Riverside
N3.SA4	Thameside West	Silvertown Landing, Thames Wharf
N4.SA1	Royal Albert North	Royal Albert North
N5.SA1	Canning Town East	Canning Town East
N5.SA2	Silvertown Way East	Silvertown Way East
N5.SA3	Canning Town Holiday Inn	N/A
N5.SA4	Limmo	Limmo
N5.SA5	Canning Town Riverside	Canning Town Riverside

Reference number	Name	Current Newham Local Plan Name or LLDC Local Plan Name (*)
N5.SA6	Custom House Phase 1	Custom House/ Freemasons and Hartington Close/ Vandome Rd
N5.SA7	Custom House Phase 2	Coolfin North
N5.SA8	Custom House Phase 3	Canning Town Area 4
N7.SA1	Abbey Mills	Abbey Mills
N7.SA2	Parcelforce	Parcelforce
N7.SA3	Sugar House Island	Sugar House Lane*
N8.SA1	Stratford Central	Stratford Central
N8.SA2	Stratford Station	N/A
N8.SA3	Greater Carpenters District	N/A
N8.SA4	Stratford High Street Bingo Hall	N/A
N8.SA5	Stratford Town Centre West	Stratford Town Centre West*
N8.SA6	Stratford Waterfront South	Stratford Waterfront South*
N8.SA7	Rick Roberts Way	Rick Roberts Way*
N8.SA8	Bridgewater Road	Bridgewater Road*
N8.SA9	Pudding Mill	Pudding Mill*
N8.SA10	Chobham Farm North	Chobham Farm North*
N9.SA1	Plaistow North	Plaistow North
N10.SA1	Balaam Leisure Centre	Balaam Leisure Centre
N10.SA2	Newham 6 <sup>th</sup> Form College	N/A
N10.SA3	Newham Leisure Centre	N/A
N10.SA4	Balaam Street Health Complex	N/A
N11.SA1	East Beckton Town Centre	N/A
N11.SA2	Cyprus	Cyprus 4
N11.SA3	Royal Road	N/A
N13.SA1	East Ham Western Gateway	East Ham Western Gateway

Reference number	Name	Current Newham Local Plan Name or LLDC Local Plan Name (*)
N13.SA2	East Ham Primark	N/A
N13.SA3	Former East Ham Gasworks	N/A
N14.SA2	Shrewsbury Road Health Complex	N/A
N14.SA1	Queen's Market	Queen's Market
N15.SA1	Lord Lister Health Centre	Forest Gate North
N15.SA2	Woodgrange Road West	Woodgrange Road West

## Summary of Effects

- 5.8.4 As noted in **Section 4.2** of this report, SO5: 'Economic benefits', SO9: 'Climate change', SO10: 'Sustainable design', SO11: 'Natural resources', SO17: 'Reducing waste', SO20: 'Young people' and SO21: 'Reducing crime' are scored as being neutral for all of the sites and are therefore not included within **Table 5.13** that identifies the potential effects of the Sites against the IIA Objectives and additional commentary is provided below. **Appendix H** provides a matrix for each site.
- 5.8.5 The following sites scored as having a significant positive effect against SO1: 'Town Centres' due to them potentially creating a large amount of town centre uses within or close to an existing town centre (including the creation of a new town centre):
- ▶ Beckton Riverside Scenario 1 – No New DLR Station
  - ▶ Beckton Riverside Scenario 2 – New DLR Station
  - ▶ East Beckton Town Centre
  - ▶ Stratford Central
  - ▶ Stratford Station
  - ▶ Stratford Town Centre West
  - ▶ Thameside West.
- 5.8.6 The following sites scored as having a significant positive effect against SO2: 'Neighbourhoods' due to them providing not just one neighbourhood benefit i.e., providing both open spaces and a new health facility/school/community facility or a mixture of all of these:
- ▶ Abbey Mills
  - ▶ Beckton Riverside Scenario 1 – No New DLR Station
  - ▶ Beckton Riverside Scenario 2 – New DLR Station
  - ▶ Canning Town East
  - ▶ Connaught Riverside
  - ▶ Custom House Phase 1
  - ▶ Custom House Phase 2
  - ▶ East Beckton Town Centre
  - ▶ Former East Ham Gasworks

- ▶ East Ham Western Gateway
- ▶ Greater Carpenter's District
- ▶ Lord Lister Health Centre
- ▶ Newham Leisure Centre
- ▶ North Woolwich Gateway
- ▶ Parcelforce
- ▶ Plaistow North
- ▶ Pudding Mill
- ▶ Queen's Market Option 1
- ▶ Queen's Markets Option 2
- ▶ Rick Roberts Way
- ▶ Royal Albert North
- ▶ Royal Road
- ▶ Rymill Street
- ▶ Silvertown Quays
- ▶ Stratford Central
- ▶ Stratford Station
- ▶ Thameside West.

5.8.7 The following sites are identified as having significant negative effects against SO3: 'Place-making' due to them potentially having effects on important heritage assets:

- ▶ Abbey Mills
- ▶ Canning Town East
- ▶ Connaught Riverside
- ▶ North Woolwich Gateway
- ▶ Parcelforce
- ▶ Royal Albert North
- ▶ Stratford Central.

5.8.8 The Local Plan contains policies that would aid in reducing potential effects on heritage assets and the assessment is not proposing amendments to these policies or additional mitigation

5.8.9 The Local Plan provides mitigation through general policies including Policy D8 'Conservation Areas and Areas of Townscape Value' D9 'Archaeological Priority Areas' and signposted guidance and Policy D10 'Designated and non-designated heritage assets, ancient monuments and historic parks and gardens' no additional mitigation is suggested.

5.8.10 The following sites are identified as having a significant positive effect on SO4: 'Employment' as they would provide employment within a Strategic Industrial Location (SIL).

- ▶ Beckton Riverside Scenario 1 – No New DLR Station
- ▶ Beckton Riverside Scenario 2 – New DLR Station
- ▶ Thameside West.

5.8.11 The following sites are identified as having a significant positive effect on SO6: 'Education' due to them providing a school or childcare facility:

- ▶ Beckton Riverside Scenario 1 – No New DLR Station
- ▶ Beckton Riverside Scenario 2 – New DLR Station
- ▶ Connaught Riverside
- ▶ East Ham Western Gateway
- ▶ Lyle Park West
- ▶ Newham Leisure Centre



- ▶ Parcellforce
- ▶ Plaistow North
- ▶ Queen's Markets Option 2
- ▶ Rick Roberts Way
- ▶ Royal Road
- ▶ Silvertown Quays
- ▶ Stratford Station
- ▶ Stratford Waterfront South
- ▶ Thameside West.

5.8.12 The following sites are identified as having a significant positive effect on SO7: 'Housing stock' due to likely enabling the improvement of a large amount of Newham's existing housing stock:

- ▶ Canning Town East
- ▶ Custom House Phase 1
- ▶ Custom House Phase 2
- ▶ Custom House Phase 3
- ▶ Greater Carpenters District
- ▶ Queen's Market Option 2.

5.8.13 The exact scale of housing development which will come forward on each site allocation will depend on further detailed site design work undertaken through the application process. A range of housing capacities could be delivered while still meeting the design, housing, neighbourhood and site allocation policies and design requirements in the draft Local Plan. As such all allocations delivering housing are assumed to have a significant positive effect, with a degree of uncertainty. This approach may be further refined as preparation of the Local Plan progresses. It is assumed that the contribution from allocations would be broadly in line with the overall target set by the London Plan, i.e. it would not be increased to reflect potential additional capacity that the allocations could provide and the contribution from other sources of supply would be managed accordingly to reflect any uplift in capacity from allocated sites and five year land supply considerations).

5.8.14 The following sites are identified as having a significant positive effect on SO12: 'Flood risk' due to being in an area not at risk of flooding (Flood Zone 1):

- ▶ Balaam Leisure Centre
- ▶ Balaam Street Health Complex
- ▶ Cobham Farm North
- ▶ East Ham Primark
- ▶ East Ham Western Gateway
- ▶ Lord Lister Health Centre
- ▶ Newham Sixth Form College
- ▶ Queen's Market Option 1
- ▶ Queen's Markets Option 2
- ▶ Shrewsbury Road Health Complex
- ▶ Woodgrange Road West.

5.8.15 The following sites are identified as having a significant negative effect in relation to SO12: 'Flood risk'

- ▶ Abbey Mills
- ▶ Beckton Riverside Scenario 1 – No New DLR Station
- ▶ Beckton Riverside Scenario 2 – New DLR Station
- ▶ Bridgewater Road

- ▶ Canning Town East
- ▶ Canning Town Holiday Inn
- ▶ Canning Town Riverside
- ▶ Connaught Riverside
- ▶ Custom House Phase 1
- ▶ Custom House Phase 2
- ▶ Custom House Phase 3
- ▶ Cyprus
- ▶ East Beckton Town Centre
- ▶ Former East Ham Gasworks
- ▶ Greater Carpenter's District
- ▶ Limmo
- ▶ Lyle Park West
- ▶ North Woolwich Gateway
- ▶ Parcelforce
- ▶ Plaistow North
- ▶ Pudding Mill
- ▶ Rick Roberts Way
- ▶ Royal Albert North
- ▶ Royal Road
- ▶ Rymill Street
- ▶ Silvertown Quays
- ▶ Silvertown Way East
- ▶ Stratford Central
- ▶ Stratford High Street Bingo Hall
- ▶ Stratford Station
- ▶ Stratford Town Centre West
- ▶ Stratford Waterfront South
- ▶ Sugar House Island
- ▶ Thameside West.

5.8.16 The Local Plan provides mitigation through a range of policies including Local Plan GWS1 'Green Spaces' which requires proposals for publicly accessible space to integrate sustainable urban drainage. GWS2 'Water spaces' seeks to ensure water spaces form part of local flood defences and do not compromise the resilience of their surroundings. Policy CE7 'Managing Flood Risk' would ensure new development does not compromise the flood resilience of its surroundings and is not at risk of flooding. Policy CE8: 'Sustainable drainage' requires development to reduce surface water flood risk and Policy T3: 'Transport behaviour change' requires consideration of sustainable drainage, including the use of permeable surfaces and rain gardens/bioswales. No additional mitigation is suggested.

5.8.17 The following sites are identified as having a significant positive effect on SO13: 'Land quality' due to likely resulting in the development of a large quantity of previously developed land:

- ▶ Abbey Mills
- ▶ Beckton Riverside Scenario 1 – No New DLR Station
- ▶ Beckton Riverside Scenario 2 – New DLR Station
- ▶ Canning Town East
- ▶ Connaught Riverside
- ▶ Custom House Phase 2
- ▶ East Beckton Town Centre
- ▶ Greater Carpenter's District
- ▶ Limmo
- ▶ Lyle Park West
- ▶ Parcelforce
- ▶ Pudding Mill
- ▶ Royal Albert North
- ▶ Silvertown Quays
- ▶ Stratford Central
- ▶ Stratford Station
- ▶ Stratford Town Centre West

- ▶ Stratford Waterfront South
- ▶ Thameside West.
- ▶ Sugar House Island

5.8.18 The following sites are identified as having a significant positive effect against SO16: 'Sustainable transport' due to them being identified as a site that lies wholly or partly within PTAL 5 or 6a/b land:

- ▶ Abbey Mills
- ▶ Balaam Street Health Complex
- ▶ Bridgewater Road
- ▶ Canning Town East
- ▶ Canning Town Holiday Inn
- ▶ Canning Town Riverside
- ▶ Chobham Farm North
- ▶ East Ham Primark
- ▶ East Ham Western Gateway
- ▶ Greater Carpenter's District
- ▶ Limmo
- ▶ Lord Lister Health Centre
- ▶ Parcellforce
- ▶ Plaistow North
- ▶ Pudding Mill
- ▶ Queen's Market Option 1
- ▶ Queen's Markets Option 2
- ▶ Rick Roberts Way
- ▶ Stratford Central
- ▶ Stratford High Street Bingo Hall
- ▶ Stratford Station
- ▶ Stratford Town Centre West
- ▶ Stratford Waterfront South
- ▶ Sugar House Island
- ▶ Woodgrange Road West.

5.8.19 The Royal Road site is identified as having significant negative effects against SO16: 'Sustainable transport' due to it being entirely PTAL 1b.

5.8.20 The following sites were identified as having a significant positive effect against SO18: 'Community facilities' due to providing new community facilities:

- ▶ Abbey Mills
- ▶ Beckton Riverside Scenario 1 – No New DLR Station
- ▶ Beckton Riverside Scenario 2 – New DLR Station
- ▶ Connaught Riverside
- ▶ Custom House Phase 1
- ▶ East Beckton Town Centre
- ▶ Former East Ham Gasworks
- ▶ Greater Carpenter's District
- ▶ Newham Leisure Centre
- ▶ Parcelforce
- ▶ Queen's Market Option 1
- ▶ Queen's Markets Option 2
- ▶ Rick Roberts Way
- ▶ Silvertown Quays
- ▶ Stratford Central
- ▶ Thameside West.

5.8.21 The following sites were identified as having a significant positive effect against SO19: 'Inclusion' due to providing housing and/or employment development within one of the 10% most deprived LSOAs in the Borough:

- ▶ Custom House Phase 1
- ▶ Custom House Phase 2
- ▶ Custom House Phase 3
- ▶ East Beckton Town Centre
- ▶ Royal Albert North
- ▶ Royal Road
- ▶ Silvertown Quays.

5.8.22 The following sites were identified as having a significant positive effect against SO22: 'Health and wellbeing' due to providing a new health facility (not just replacing a health facility on site):

- ▶ Balaam Street Health Complex
- ▶ Beckton Riverside Scenario 1 – No New DLR Station
- ▶ Beckton Riverside Scenario 2 – New DLR Station
- ▶ Custom House Phase 1
- ▶ East Beckton Town Centre
- ▶ East Ham Western Gateway
- ▶ Parcelforce
- ▶ Pudding Mill
- ▶ Queen's Market Option 1
- ▶ Queen's Markets Option 2
- ▶ Rymill Street
- ▶ Silvertown Quays

- ▶ Shrewsbury Road Health Complex
- ▶ Stratford Central.



**Table 5.13 Summary of Effects for Sites**

Site	SO1: 'Town Centres'	SO2: 'Neighbourhoods'	SO3: 'Place-making'	SO4: 'Employment'	SO6: 'Education'	SO7: 'Housing stock'	SO8: 'Housing supply'	SO12: 'Flood risk'	SO13: 'Land quality'	SO14: 'GBI'	SO15: 'Biodiversity'	SO16: 'Sustainable transport'	SO18: 'Community facilities'	SO19: 'Inclusion'	SO22: 'Health and wellbeing'
Abbey Mills	0	++	-	0	0	0	++/?	-	++	++	-	++	++	+	0
Balaam Leisure Centre	0	0	-	0	0	0	++/?	++	+	?	0	+	0	+	0
Balaam Street Health Complex	0	0	-	0	0	0	++/?	++	+	?	-	++	0	+	++
Beckton Riverside Scenario 1 – No New DLR Station	++	++	-	++	++	0	++/?	-	++	++	-	+	++	+	++
Beckton Riverside Scenario 2 – New DLR Station	++	++	-	++	++	0	++/?	-	++	++	-	+	++	+	++
Bridgewater Road	0	0	-	0	0	0	++/?	-	+	+	-	++	0	+	0
Canning Town East	0	++	-	+	0	++	++/?	-	++	+	0	++	+	+	0
Canning Town Holiday Inn	+	0	-	+	0	0	++/?	-	+	+	-	++	0	+	0
Canning Town Riverside	0	0	-	+	0	0	++/?	-	+	+	-	++	0	+	0





Site	SO1: 'Town Centres'	SO2: 'Neighbourhoods'	SO3: 'Place-making'	SO4: 'Employment'	SO6: 'Education'	SO7: 'Housing stock'	SO8: 'Housing supply'	SO12: 'Flood risk'	SO13: 'Land quality'	SO14: 'GBI'	SO15: 'Biodiversity'	SO16: 'Sustainable transport'	SO18: 'Community facilities'	SO19: 'Inclusion'	SO22: 'Health and wellbeing'
Chobham Farm North	0	0	-	+	0	0	++/?	++	+	0	0	++	0	+	0
Connaught Riverside	+	++	--	+	++	0	++/?	--	++	+	-	-	++	+	0
Custom House Phase 1	+	++	-	0	0	++	++/?	--	+	?	-	+	++	++	++
Custom House Phase 2	0	++	-	0	+	++	++/?	--	++	+	0	+	0	++	0
Custom House Phase 3	0	0	-	0	0	++	++/?	--	+	+	-	-	0	++	0
Cyprus	0	0	-	0	0	0	++/?	--	-	?	-	+	0	+	0
East Beckton Town Centre	++	++	-	0	0	0	++/?	--	++	++	-	+	++	++	++
East Ham Primark	+	0	-	0	0	0	++/?	++	+	?	0	++	0	+	0
East Ham Western Gateway	0	++	-	0	++	0	++/?	++	+	?	0	++	+	+	++
Former East Ham Gasworks	0	++	-	0	0	0	++/?	--	+	++	-	-	++	+	0



Site	SO1: 'Town Centres'	SO2: 'Neighbourhoods'	SO3: 'Place-making'	SO4: 'Employment'	SO6: 'Education'	SO7: 'Housing stock'	SO8: 'Housing supply'	SO12: 'Flood risk'	SO13: 'Land quality'	SO14: 'GBI'	SO15: 'Biodiversity'	SO16: 'Sustainable transport'	SO18: 'Community facilities'	SO19: 'Inclusion'	SO22: 'Health and wellbeing'
Greater Carpenter's District	-	++	-	+	+	++	++/?	--	++	+	0	++	++	+	0
Limmo	0	0	-	0	0	0	++/?	--	++	++	-	++	0	+	0
Lord Lister Health Centre	0	++	?	0	0	0	++/?	++	+	+	0	++	0	+	++
Lyle Park West	+	0	-	0	++	+	++/?	--	++	++	-	+	0	+	0
Newham Leisure Centre	0	++	0	+	++	0	++/?	-	?	++	-	+	++	+	0
Newham Sixth Form College	0	0	0	0	+	0	++/?	++	+	+	0	+	0	+	0
North Woolwich Gateway	0	++	--	+	-	0	++/?	--	+	+	-	+	0	+	0
Parcelforce	+	++	--	+	++	0	++/?	--	++	++	-	++	++	+	++
Plaistow North	+	++	-	0	++	0	++/?	--	+	+	-	++	0	+	0
Pudding Mill	+	++	-	+	0	0	++/?	--	++	+	-	++	0	+	++
Queen's Market Option 1	+	++	?	+	0	+	0	++	+	0	-	++	++	+	++



Site	SO1: 'Town Centres'	SO2: 'Neighbourhoods'	SO3: 'Place-making'	SO4: 'Employment'	SO6: 'Education'	SO7: 'Housing stock'	SO8: 'Housing supply'	SO12: 'Flood risk'	SO13: 'Land quality'	SO14: 'GBI'	SO15: 'Biodiversity'	SO16: 'Sustainable transport'	SO18: 'Community facilities'	SO19: 'Inclusion'	SO22: 'Health and wellbeing'
Queen's Markets Option 2	+	++	?	+	++	++	++/?	++	+	?	-	++	++	+	++
Rick Roberts Way	0	++	-	+	++	0	++/?	--	+	++	-	++	++	+	0
Royal Albert North	0	++	--	+	+	0	++/?	--	++	+	-	+	+	++	0
Royal Road	0	++	-	0	++	0	++/?	--	-	?	-	--	0	++	0
Rymill Street	+	++	-	0	-	0	++/?	--	+	+	-	-	0	+	++
Shrewsbury Road Health Complex	0	0	-	0	0	0	++/?	++	+	?	0	+	0	+	++
Silvertown Quays	+	++	-	+	++	0	++/?	--	++	++	-	+	++	++	++
Silvertown Way East	0	0	-	+	0	0	++/?	--	+	0	-	+	+	+	0
Stratford Central	++	++	--	+	0	0	++/?	--	++	++	-	++	++	+	++
Stratford High Street Bingo Hall	-	0	-	+	0	0	++/?	--	+	+	0	++	0	+	0
Stratford Station	++	++	-	+	++	0	++/?	--	++	++	0	++	0	+	0
Stratford Town Centre West	++	0	-	0	0	0	++/?	--	++	++	-	++	0	+	0



Site	SO1: 'Town Centres'	SO2: 'Neighbourhoods'	SO3: 'Place-making'	SO4: 'Employment'	SO6: 'Education'	SO7: 'Housing stock'	SO8: 'Housing supply'	SO12: 'Flood risk'	SO13: 'Land quality'	SO14: 'GBI'	SO15: 'Biodiversity'	SO16: 'Sustainable transport'	SO18: 'Community facilities'	SO19: 'Inclusion'	SO22: 'Health and wellbeing'
Stratford Waterfront South	0	0	-	+	++	0	++/?	-	++	?	-	++	0	+	0
Sugar House Island	0	0	-	+	0	0	++/?	-	++	++	-	++	0	+	0
Thameside West	++	++	-	++	++	0	++/?	-	++	++	-	+	++	+	0
Woodgrange Road West	+	0	-	+	0	0	++/?	++	+	?	-	++	+	+	0

## Reasons for the Selection of Proposed Site Allocations

5.8.23 The Council has identified 44 sites that it considered to be potentially appropriate for allocation in the Local Plan. Their selection has been justified as they are considered suitable, available and achievable, would contribute to the objectives of the Local Plan and allocation is the best way to secure the desired outcome. If other sites are proposed for allocation during consultation on the draft Local Plan, these will then be considered as part of the preparation of the Regulation 19 draft Local Plan.

## 5.9 Cumulative, Synergistic and Secondary Effects of Policies and Sites

- 5.9.1 This section identifies significant cumulative effects that could occur between policies in each chapter of the draft Local Plan. Cumulative effects and any synergist and secondary effects have also been identified by considering the policies in the round. **Table 5.14** summarises the results.
- 5.9.2 Potential cumulative effects have been identified through professional judgement having regard to the overall performance of policies and how they might interact against specific IIA objectives. The text and table also consider the potential for cumulative and synergistic effects associated with other relevant plans and programmes (primarily the London Plan 2021).
- 5.9.3 The Economy policies, Neighbourhood policies and proposed Sites Allocations have the potential to provide significant positive cumulative effects against SO1: 'Town Centres' through aiding in creating new and improving existing town centres within Newham. There is potential for further significant positive cumulative and synergistic effects with other plans and programmes which seek to improve London's town centres (London Plan 2021 Policy SD6 & SD8).
- 5.9.4 Many of the draft Local Plan policies and Sites would provide a mixture of minor to significant positive effects with regard to SO2: 'Neighbourhoods' by requiring new community facilities, open spaces, health facilities and other development that would work to support and improve the neighbourhoods and the lives of its residents.
- 5.9.5 The Green and Blue Spaces, Transport, Neighbourhood policies and Site Allocations are identified as having significant positive cumulative effects against SO3: 'Place-making', which would be supported by most of the other policies of the draft Local Plan scoring as having minor positive effects. This is due to the policies seeking to preserve elements of Newham's built environment that are important to its character and setting (often important heritage buildings), whilst also requiring development to be well-designed. Neighbourhood Policies and Site Allocations have the potential to affect important heritage assets (usually Listed Buildings and Conservation Areas), though it is important to note that, cumulatively, the other policies of the draft Local Plan would ensure that significant positive effects are maximised with potential negatives minimised. Similarly, cumulatively the Heritage and Culture policies of the London Plan 2021 would further contribute to the protection of assets and no additional mitigation is suggested.
- 5.9.6 The policies and proposed Sites Allocations of the draft Local Plan cumulatively provide many opportunities for the creation of new employment development and would therefore having a cumulative significant positive effect against SO4: 'Employment'. The economic policies of neighbouring Councils and the Economy policies and chapter of the London Plan 2021 would provide further potential for greater cumulative and synergistic positive effects.

- 5.9.7 The economic policies of the draft Local Plan would provide a cumulative significant positive effects against SO5: 'Economic benefits' due to being focused upon providing economic benefit and trying to keep such benefits within Newham. The Neighbourhood policies and proposed Site Allocations are also identified as having a cumulative significant positive effect against SO5: 'Economic benefits' but uncertainties exist in terms of these effects and other policies due to it not being known how likely economic effects can be retained within the borough.
- 5.9.8 The Community Facilities and Neighbourhood policies and proposed Site Allocations of the draft Local Plan would all aid in the provision of new school and childcare facilities that are well located and of an appropriate size and scale to meet identified needs. It is therefore considered that the policies and proposed Site Allocations of the draft Local Plan would have a significant positive cumulative effect with regard to SO6: 'Education'.
- 5.9.9 Neighbourhood policies and proposed Site Allocations would allow for and see improvement to the housing stock of certain neighbourhoods, causing significant positive cumulative effects against SO7: 'Housing stock'.
- 5.9.10 The Neighbourhood policies and proposed Site Allocations of the draft Local Plan would help meet identified housing needs, creating a significant positive cumulative effect against SO8: 'Housing supply'. The other policies of the draft Local Plan would not have significant positive effects but would, generally, help to ensure any housing created within Newham are well-designed and improve their surroundings, aiding in the wider creation of positive cumulative effects.
- 5.9.11 The draft Local Plan includes Climate Change policies in order to ensure its wider effects would not contribute towards climate change, help to address the ongoing climate emergency, and ensure that development in the borough is net-zero carbon. The potential for significant negative effects is however identified as new development and associated activity will give rise to greenhouse gas emissions, including transport related emissions. The Local Plan requires development to be net zero carbon and seeks to promote more sustainable forms of transport and car free development, no additional mitigation is therefore suggested.
- 5.9.12 Significant positive cumulative effects are identified in terms of the draft Local Plans Climate Change and Transport policies against SO10: 'Sustainable design', with the other policies and the proposed Site Allocations providing minor positive effects against this IIA Objective. The policies would therefore cumulatively work to ensure development within Newham is sustainable and emphasises sustainable forms of transportation and infrastructure.
- 5.9.13 The Green and Blue Spaces and Waste and Utilities policies of the draft Local Plan would work to protect the existing natural resources of the borough whilst also ensuring waste is minimised. The Neighbourhood policies proposed Site Allocations would also work to ensure development would be air quality neutral/positive. Cumulatively, these identified policies and Site Allocations would have a significant cumulative effect regarding SO11: 'Natural resources. The other policies of the draft Local Plan would also cumulatively aid in this, though not to the degree of the aforementioned elements of the draft Local Plan.
- 5.9.14 Cumulative significant positive effects are identified against SO12: 'Flood risk' for the Climate Change policies, which include several policies that seek to ensure flood risk is managed effectively.
- 5.9.15 The majority of the policies of the draft Local Plan would not be related directly to SO13: 'Land quality', though some of the policies would have minor positive cumulative effects that would conserve the borough's important land resources. They would also further support the Neighbourhood policies and proposed Site Allocations, helping to enhance



their significant positive cumulative effects against SO13: 'Land quality', as sites help utilise previously developed land and buildings.

- 5.9.16 The Green and Blue Spaces and Neighbourhood policies and proposed Site Allocations are identified as having significant positive cumulative effects against SO14; 'GBI' due to them protecting existing open/green spaces and/or providing new open spaces. The extent to which existing shortfalls in open space can be addressed is uncertain. Cumulatively, the policies of the draft Local Plan that have minor positive effects (such as its Design policies) would work to reduce such uncertainty.
- 5.9.17 In relation to SO15: 'Biodiversity', some of the proposed Site Allocations would potentially compromise or affect important local biodiversity assets and therefore a minor negative cumulative effect is identified alongside significant positives and uncertainties. Cumulatively, the other policies of the draft Local Plan and the London Plan 2021 would work to ensure such negative effects are minimised, with positives maximised when all policies and Site Allocations are resolved together. Overall the Local Plan should deliver a net gain in biodiversity within the borough.
- 5.9.18 For SO16: 'Sustainable transport', cumulative positive significant effects are identified for the draft Local Plans Green and Blue Spaces, Transport, Neighbourhood and proposed Site Allocations. This is due to them creating green infrastructure, encouraging, and actively supporting active and sustainable forms of travel and creating sites that are in locations of high accessibility (Site lies wholly or partly within PTAL 5 or 6a/b). However, some of the Sites would be located in areas of low PTAL and therefore minor negative cumulative effects are also identified, though the aforementioned policies would aid in reducing such cumulative effects. The neighbouring borough's transport policies would work to aid in ensuring the edges of Newham are as accessible, with all of the borough cumulatively working to ensure London is a highly accessible and traversable place (especially by active and sustainable forms of transport). This would also be supported by the Sustainable Infrastructure policies of the London Plan 2021, further ensuring development within Newham has a positive effect on its and London's infrastructure.
- 5.9.19 The draft Local Plan would create new community facilities within Newham that are accessible for its residents and the residents of London as a whole. This is supported significantly by its Community Facilities, Transport, Neighbourhood policies and proposed Site Allocations which would achieve this and are identified as having significant positive cumulative effects regarding SO18: 'Community facilities'.
- 5.9.20 Many of the policies and proposed Site Allocations of the draft Local Plan would provide either minor or significant positive cumulative effects regarding SO19: 'Inclusion'. This is due to the policies providing new and accessible community facilities and development, that is well located and interconnected to its surroundings. The Site Allocations would all also work to aid in addressing areas that experience some form of deprivation, helping to improve these areas.
- 5.9.21 The draft Local Plan would provide opportunities for young people through creating new education and community facilities, alongside safeguarding and providing open spaces for them to enjoy. It would also create economic opportunities for young people to better be able to start their careers/find employment. The Community Facilities and Neighbourhood policies and proposed Site Allocations would be exceptional at achieving this and are identified as having significant positive cumulative effects against SO20: 'Young people'. All of the policies and Site Allocations working together would create greater significant positive cumulative effects.
- 5.9.22 For IIA Objective SO22: 'Health and wellbeing', all of the policies and proposed Site Allocations were identified as having either minor or significant positive cumulative effects. Policies look to deliver healthcare facilities, encourage a healthier/active lifestyle by

design, creating economic opportunities for its residents and providing open/green spaces.

**Table 5.14 Cumulative, Synergistic and Secondary Effects**

IIA Objectives	Building a Fairer Newham	Community Facilities	Design	Green and Blue Spaces	Economy	High Street	Homes	Climate Change	Transport	Waste and Utilities	Neighbourhood Policies & Site Allocations
SO1: 'Town Centres'	+	+	+	+	++	+	+	+	+	+	++
SO2: 'Neighbourhoods'	+	++/?	+	++/?	+	+	+	+	++	+	++
SO3: 'Place-making'	+	+	+	++	+	+	+	+	++	+	++/-
SO4: 'Employment'	+	++	~	+	++	+	~	+	++	+	++
SO5: 'Economic benefits'	+/?	+	~	+	++	+	~	~	+	+	++/?
SO6: 'Education'	+	++	~	+	~	~	+	~	++	+	++
SO7: 'Housing stock'	+	~	~	~	~	~	~	~	~	~	++
SO8: 'Housing supply'	+	~	+	~	~	+	+	~	~	~	++
SO9: 'Climate change'	+/--/?	~	+	+	+	~	~	++	+	+/?	+/--/?
SO10: 'Sustainable design'	+	+	+	~	~	~	~	++	++	+	+
SO11: 'Natural resources'	+	~	+	++	+	~	~	+	+	++/?	++/?
SO12: 'Flood risk'	+	~	~	~	~	~	~	++	~	~	-
SO13: 'Land quality'	+	~	~	+	~	~	~	~	~	~	++



IIA Objectives	Building a Fairer Newham	Community Facilities	Design	Green and Blue Spaces	Economy	High Street	Homes	Climate Change	Transport	Waste and Utilities	Neighbourhood Policies & Site Allocations
SO14: 'GBI'	+	~	+	++/?	~	~	~	~	~	~	++/?
SO15: 'Biodiversity'	+	~	+	++	~	~	~	~	+	+	++/-/?
SO16: 'Sustainable transport'	+	+	+	++	~	~	+	+	++	~	++/-
SO17: 'Reducing waste'	~	~	+	~	+	+	~	~	~	+	0
SO18: 'Community facilities'	+	++	+	+	~	+	+	~	++	+	++
SO19: 'Inclusion'	+	++	+	++/?	+	+	++	~	+	+	++
SO20: 'Young people'	+	++	~	~	+	+	+	~	+	~	++
SO21: 'Reducing crime'	+	+	+	+	+	+	+	~	+	+	+
SO22: 'Health and wellbeing'	+	++	+	++/?	+	+	+	+	++	+	++

## 5.10 Key Findings from the HIA

- 5.10.1 The extent to which the draft Local Plan policies will contribute to each of the priorities identified in the HIA Framework has been considered. Overall, the HIA identifies that the policies in the draft Local Plan will make positive contributions against the topics considered in the HIA, one potential gap was identified in relation to the design of buildings to reduce the risk of suicide and is discussed below along with other key findings. **Appendix I** provides a review of relevant policies against each of the identified priorities and examples of relevant policies are provided below.
- 5.10.2 Priority 1 concerns ensuring children have the best start in life, which policy CF4 'Education and Childcare Facilities' would aid in achieving through ensuring children have access to sufficient educational facilities.
- 5.10.3 Priority 2 is concerned with issues regarding young people being able to pursue healthy lifestyles. Policies GWS1 'Green Spaces' and CF4 'Education and Childcare Facilities' would aid in achieving this priority through providing open spaces and educational facilities. However, uncertainties exist regarding GWS1 'Green Spaces' given that the draft Local Plan acknowledges that overall provision of publicly accessible space in Newham is low, with a rate of just 0.69 hectares per 1,000 residents and that open space is unevenly distributed across the borough. Neighbourhood policies and site allocations contribute to addressing existing shortfalls and meeting future needs by identifying the location of new public spaces and opportunities to improve existing spaces. Policy D1 'Design Standards' and policy D6 of the London Plan 2021 would also work to ensure spaces are appropriate and accessible for young people.
- 5.10.4 Priority 3 seeks to ensure people with long-term illnesses or mobility needs are not prejudiced. Local Plan Policy BFN1 contributes to this policy by establishing a network of neighbourhoods and enhancement of the existing hierarchy of centres with the creation of new centres, allowing people to access services and facilities locally. Policies H11 'Housing Design Quality' would ensure wheelchair users and people with dementia are provided with appropriate housing for their needs, with policy D1 'Design Standards' ensuring all developments are designed to accommodate the requirements of people with mobility needs and older persons.
- 5.10.5 Priority 4 is concerned with services being inclusive. Policies CF1 'Existing community facilities' Local Plan Policy CF3 'Cultural and leisure facilities' and BFN3 'Social Value and Health Impact Assessment', of the draft Local Plan and S2 of the London Plan 2021 would all ensure services and facilities within Newham are accessible and provide social value.
- 5.10.6 Priority 5 seeks to ensure the vulnerable of society are protected. This would be achieved by policies such as D7 'Neighbourliness' ensuring new development is neighbourly and S2 of the London Plan 2021 ensuring areas have neighbourhood policies and site allocations will also have a role in ensuring sufficient access to health facilities. Furthermore, policies that provide open space improvements (GWS1 'Green Spaces' and GWS2 'Water Spaces') would ensure quiet open spaces are delivered/protected. This priority includes consideration of whether or not policies and options have been informed by residents. It should be noted that it is recommended that the draft Local Plan provide further information in relation to community engagement in relation to those policies and allocations that relate to redevelopment of existing areas that would involve the loss of existing business space, and how impacts on owners and employees can be mitigated, e.g. through relocation or other means of support.
- 5.10.7 Priority 6 seeks to ensure Newham has a healthy food environment. Local Plan Policy BFN1 contributes to this policy by establishing a network of neighbourhoods and enhancement of the existing hierarchy of centres with the creation of new centres.

Policies GWS1 'Green Spaces' and HS6 'Health and Wellbeing on the High Street' would aid in this by allowing residents to grow their own food and ensuring Newham is not dominated by fast food development/services. Local Plan Policy HS4: Markets and events/pop-up spaces protects existing pitch capacity, encourages improvements and sets out requirements for temporary/pop up events.

- 5.10.8 Priority 7 seeks to encourage active travel and improve air quality, whilst Priority 8 wishes to ensure Newham is an active place. This would be achieved by the draft Local Plan seeking to encourage 15 minute neighbourhoods and policies such as D5 'Living Well at High Density', D1 'Design Standard', T2 'Local Transport' and T3 'Transport Behaviour Change' would all work to create highly accessible, pedestrianised, and safe places that are well connected. Furthermore, policies such as GWS1 'Green spaces' would ensure residents of the borough have access to open/green spaces, allowing people to undertake an active lifestyle. Neighbourhood policies would also have a role in contributing to this priority by identifying opportunities for active travel in each of the areas.
- 5.10.9 Priority 9 relates to the creation of healthy environments within Newham that are populated by well-connected communities. This priority is very broad, covering issues ranging from community facilities provision to flood risks and crime.
- 5.10.10 Policies CF1 'Existing community facilities' and CF2 'New and re-provided community facilities' ensures the communities of Newham have sufficient facilities. Other policies, such as D2 'Public Realm Net Gain', S2 'Managing New and Existing Town and Local Centres' and HS4 'Markets and Events/Pop up Spaces' ensure there is flexibility in the services and facilities the communities of Newham can set-up or be serviced by. Policy S6 of the London Plan 2021 also ensures places within Newham have access to sufficient public toilet facilities, with policy CG6 ensuring spaces are safe from terrorism.
- 5.10.11 Policy D7 'Neighbourliness' also works to ensure community spaces and Newham's community can experience places that are designed to deter crime and are safe to travel around. Policy CE1 'Environmental Design and Delivery' would ensure communities created would be resilient to the effects of climate change, with policy CE4 'Overheating' targeting the problem of overheating and CE7 'Managing Flood Risk' ensuring flood risk is minimised.
- 5.10.12 It is noted that the London Plan 2021 and draft Local Plan do not contain provisions that aid in reducing the risk of suicide and could contain something regarding this such as for tall buildings that include a viewing area that is open to the public or any buildings over 4 storeys that include a balcony. The Council has indicated that it will rely on London Plan 2021 Policy D9 'Tall Buildings' in relation to safety associated with tall buildings and that other policies in the Local Plan provide sufficient safeguards (refer to **Table 5.16**).
- 5.10.13 Priority 10 contains the desire to make Newham smoking free which the London Plan 2021 and draft Local Plan are silent about, however the Local Plan is limited in its ability to address this priority.
- 5.10.14 Priority 11 seeks to ensure the borough's housing promotes good health. The policies of the draft Local Plan would contribute to this through ensuring housing is well designed, allows for the creation of specialist housing, ensure housing is accessible and affordable and ensuring existing housing has opportunities to be improved. The draft Local Plan would also ensure housing developments have sufficient access to open/green spaces. Policy D7 'Neighbourliness' requires development to achieve good neighbourliness from the outset by avoiding negative and maximising positive social and environmental impacts of design on neighbours on and off the site. Policy D14 of the London plan 2021 would also ensure residents of Newham are not affected by high levels of noise.
- 5.10.15 Priority 12 seeks to ensure Newham is an inclusive economy and tackles its poverty problems. Policy J1 'Employment and Growth' and J4 'Delivering Community Wealth



Building and Inclusive Growth' would create employment opportunities within Newham, whilst also ensuring there are training opportunities for people to pursue better careers and standard of living. The draft Local Plan also contains policies relating to employment floorspace that would have similar positive effects.

## 5.11 Key Findings from the EqIA

- 5.11.1 The Council has developed an EqIA Framework which guides the EqIA on the draft Local Plan and Submission Local Plan. Section 4.5 of this report provides more information on the approach to the EqIA. The completed EqIA Framework is provided at **Appendix J** of this report, this highlights those instances where an issue might be particularly relevant to a group with a protected characteristic and the results summarised below. The EqIA is an iterative exercise and it will be updated in light of comments on this report. Policies in the London Plan 2021 are also relevant, regard has been had to the need to avoid the Local Plan duplicating its policies.
- 5.11.2 The legislative requirements relating to marriage and civil partnership are only relevant in the context of the Borough Council's role as an employer and are not therefore relevant to the EqIA for the draft Local Plan, however policies relating to housing could assist with the formation of new households, thereby making an indirect contribution to this protected characteristic.
- 5.11.3 There are policies in the draft Local Plan which, while not focussed on people who share protected characteristics, could have significant positive effects. Relevant policies are summarised below, reflecting the issues identified in the EqIA at **Appendix J**:
- Policy BFN2 'Co-designed Masterplanning' cuts across a number of relevant issues. The policy requires masterplans to demonstrate how they will provide increased opportunities for social interaction, mixed, balanced and stable communities, environments that support good physical and mental health, spaces for young people, buildings and public spaces whose use and design reflects and meets the standards of Newham's diverse population, community wealth building, meanwhile uses and post occupancy surveys. This is a key policy that will help ensure that new development meets the needs of all residents, including those with protected characteristics.
  - **1) Reducing poverty and social exclusion:** This is a cross-cutting issue that relates to the other issues considered below. The Local Plan contains a suite of policies that will help address poverty, including policies relating to the provision of housing and improvements to existing housing, including affordable housing (Policy H3: 'Affordable Housing'), employment (including J1 'Employment and Growth'), access to education and community facilities (including Local Plan Policy CF4 'Education and childcare facilities') and improved accessibility (Local Plan Policies T1 'Strategic Transport' and T2 'Local Transport'). The spatial strategy is based on the 15 minute neighbourhood concept, helping to ensure that everyone can access services and facilities. Neighbourhood policies and strategic site allocations help to deliver development proposals that will address poverty. Poor air quality disproportionately affects the borough's poorest residents who tend to live on the most heavily polluted roads and Local Plan Policy CE6 'Air Quality' seeks to encourage air quality neutral development. Draft Local Plan Policy BFN3 'Social Value and Health Impact Assessment' encourages developments within Newham to maximise their social value and to make a positive contribution to the health and wellbeing of communities. These policies could help address the underlying causes of poverty for all residents, including those with protected characteristics.
  - **2) Reducing health inequalities:** Local Plan Policy CF2 'New and re-provided community facilities' would help secure and protect existing community facilities,

including health facilities. Neighbourhood Policies and the Strategic allocations in the Local Plan identify the requirement for new health facilities.

- **3) Improving mental and physical health and wellbeing:** Housing and employment policies outlined above could help address this topic. Policies GWS1 'Green spaces', GWS2 'Water spaces' and GWS3 'Biodiversity, urban greening, and access to nature' would all help to create places for all of Newham's residents to enjoy that would improve their physical and mental health, including those with protected characteristics.
- **4) Providing opportunities for residents to connect:** Policies T2 'Local Transport' and D7 'Neighbourliness' would aid in ensuring opportunities for residents of every background can connect by encouraging 15 minute neighbourhoods and ensure all developments are neighbourly. These policies are potentially relevant to all residents, including those with protected characteristics.
- **5) Promoting an inclusive design approach, ensuring a barrier free environment for all:** Policies T2 'Local Transport', D7 'Neighbourliness' and D2 'Public Realm Net Gain' would all work to ensure Newham's built environment is inclusive and accessible by all people, ensuring developments promote an inclusive design approach, ensuring a barrier free environment for all. These policies are relevant to all groups, including those with protected characteristics.
- **6) Creating an environment that feels safe to all users during the day time and night time:** Policy D11 of the London Plan 2021 and draft Local Plan Policy D7 'Neighbourliness' would both work to ensure Newham has a built environment that is safe to all users during the daytime and night-time, including those with protected characteristics.
- **7) Help to make people feel positive about the area they live in and promote social integration:** Local Plan Policies D7 'Neighbourliness' and D8 'Conservation Areas and Areas of Townscape Value' would ensure development within Newham have a positive impact on their local area. The wider cumulative effects of the draft Local Plans housing, town centre and economic policies would also support this, ensuring residents feel positive about the area they live in and aid in promoting social integration. These policies are relevant to all groups, including those with protected characteristics.
- **8) Retention and development of key services and facilities:** Policies HS1 'Newham's Town Centres Network', HS2 'Managing New and Existing Town and Local Centres', HS3 'Edge-of-Centre and Out-of-Centre Retail, Restaurants, Cafes, and Services', whilst also being supported by the Community Facilities policies of the draft Local Plan, would ensure key services and facilities are developed and retained within Newham. The draft Local Plan also introduces new centres to augment the existing centres, ensuring that all residents, including those with protected characteristics are able to access services and facilities locally, including those with protected characteristics.
- **9) Ensure equity of access to environmental, social and physical infrastructure:** The T1 'Strategic Transport' and T2 'Local Transport' policies of the draft Local Plan would ensure Newham is well connected and by more sustainable forms of transport. Furthermore, the Green and Water Spaces policies would ensure new such spaces would be created and preserved within Newham, improving Newham's built and natural environment. Policy T3 'Transport Behaviour Change' would also encourage a modal shift within Newham to better forms of transport, improving the accessibility of the borough for all, including those with protected characteristics. Policy T3 makes provision for blue badge parking or mobility scooter parking in developments. Cycle

storage should be accessible to all, allowing parking of a wide variety of mobility options – including bicycles, e-bikes, tandems, cargo bikes, electric scooters, buggies and mobility scooters.

- **10) Green and blue spaces that are safe and accessible to all:** Local Plan’s Green and Water Spaces policies (GW1, GW2, GW3, GW4 and GW5) all seek to create or support more natural and greener open/water spaces that are accessible by everyone, including those with protected characteristics.
- **11) Increase the amount, range, quality and affordability of housing:** The Housing policies of the draft Local Plan (H1, H2, H3, H4, H5, H6, H7, H8, H9, H10 and H11) would work to increase the amount, range, quality, and affordability of housing. The policies will help contribute to meeting identified needs, including those associated with protected characteristics.
- **12) Increase the choice of accessible and adaptable homes:** Local Plan Policy H4 ‘Housing Mix’ seeks to ensure a range of housing is provided within Newham, with family homes being given special importance. Policies H6 ‘Supported and Specialist Housing’ and H7 ‘Housing for older people’ would ensure accommodation is created for people of various ages and those with specific requirements, including those with protected characteristics.
- **13) Providing housing that encourages a sense of community and enhances the amenity value of the community:** Local Plan Policy H1 ‘Meeting Housing Needs’ would seek to ensure the housing needs of Newham’s communities are met. Local Plan Policy H11, ‘Housing Design Quality’ seeks to ensure accommodation within Newham is high quality and meets the needs of its residents and communities. The design policies, including Policy D1: Design standards seek to ensure that natural surveillance of communal spaces is achieved. The Characterisation Study: Borough-wide Design Principles sets out design guidance for ‘enabling cohesion and celebrating diversity’.
- **14) Minimise barriers to employment and 15) Providing employment opportunities close to home and 16) providing employment in the most deprived areas:** The Economic policies of the draft Local Plan (including J1 ‘Employment and Growth’) and policies SD1 and SD10 of the London Plan 2021 would all work to create employment opportunities within Newham, reducing potential barriers its residents face to gaining employment, including those with protected characteristics. These policies would also aid in creating employment located closer to resident’s homes and employment opportunities in areas experiencing deprivation (especially the most deprived areas that would be targets for regeneration, supported by these policies).
- **17) Improve learning and the attainment of skills to access employment opportunities:** Draft Local Plan Policy CF4 ‘Education and childcare facilities’ would help to ensure the residents of Newham are able to improve their learning and attainment of skills, especially when supported by Policy E11 of the London Plan 2021 that seeks to ensure development provides apprenticeships and other opportunities for all residents to learn skills and receive training, including those with protected characteristics.
- **18) Reduce impacts on groups more vulnerable to the effects of climate change:** The Climate policies of the draft Local Plan (e.g. Policy CE2 relating to net zero carbon) when supported by draft Local Plan Policy T3 ‘Transport Behaviour Change’ would ensure the impacts of climate change (especially on vulnerable people) are considered and addressed in future developments.
- **19) Reduce inequalities in access to clean air:** Draft Local Plan Policy CE6 ‘Air Quality’ requires development to be air quality neutral, with Local Plan policies T1

'Strategic Transport', T2 'Local Transport' and T3 'Transport Behaviour Change' that would all work to reduce the air quality effects resulting from transport related emissions in the borough for everyone in the borough, including those with protected characteristics. The evidence base relating to air quality will be further developed in 2023.

- **20) Public transport accessibility:** The Transport policies of the draft Local Plan (for example Local Plan Policies T1 'Strategic Transport,' T2 'Local Transport' and T3: 'Transport Behaviour Change) would work to increase the accessibility of public transport for all, including those with protected characteristics.
- **21) Minimise and reduce road, rail, and aviation noise and vibration levels and disruption:** relevant policies include Local Plan Policy T2 'Local Transport' and T3 'Transport Behaviour Change' which would encourage 15 minute neighbourhoods and non-car related travel, reducing the potential likelihood of vehicles causing disruption. Local Plan Policy T4 'Servicing a development' requires development to consider the effects of its delivery and construction traffic, which should ensure the construction phase of developments do not disrupt their surroundings to a significant degree. Local Plan Policy T5 'Airport' seeks to ensure the London City Airport minimises its effects on its surroundings, including from any ancillary/airport supporting (or associated) development.
- **22) Minimise negative impacts of waste processing and disposal:** Policies seek to minimise the impact of waste processing and disposal on vulnerable groups. Local Plan Policy W1 'Waste Management Capacity' seeks to ensure there is sufficient capacity for Newham's waste, ensuring waste can always be disposed of in a safe manner/place and properly managed. Local Plan Policy W2 'New or Improved Waste Management Facilities' would also work to ensure there is sufficient capacity for Newham's waste through allowing the expansion/improvement of existing waste facilities and the creation of new waste facilities in suitable locations. Local Plan Policy W3 'Waste Management in Developments' ensures developments consider how waste will be managed by its occupiers and that sufficient and accessible space is provided.
- **23) Contribute to the provision of smart and affordable energy system for all:** Local Plan Policy CE2 'Zero Carbon Development' seeks to ensure that development uses as little energy as possible over a year, helping to ensure that energy consumption is minimised. New development should generate renewable energy on site, to a level equivalent to, or in excess of, the predicted annual energy demand of the building. This will help ensure that energy is affordable.
- **24) Increase access to, enjoyment of and understanding of the historical and natural environment:** Local Plan policies seek to increase access to, enjoyment of and understanding of the historical and natural environment. Local Plan Policies D8 'Conservation Areas and Areas of Townscape Value', D9 Archaeological Priority Areas' and D10 'Designated and non-designated buildings, ancient monuments and historic parks and gardens' all seek to conserve and protect the various historical assets within Newham.
- **25) Increase opportunities for physical activity or play:** Policies GWS1 'Green spaces', GWS2 'Water spaces' and GWS5 'Play and informal recreation for all ages' would all ensure that over the lifetime of the draft Local Plan, more open green and water spaces are created/preserved and new play spaces are created, increasing opportunities for physical activity and play for all.
- **26) Reduce digital exclusion:** Policy W4 'Utilities and Digital Infrastructure' would be supported by policy SI6 of the London Plan 2021 to ensure the residents of Newham

have access to high quality digital services across the borough, helping to avoid digital exclusion for all.

5.11.4 It is also important to note that the Council undertakes EqIAs for regeneration projects that involve sites that are proposed to be allocated in the Local Plan, including Canning Town and Custom House and Carpenters Estate. This should help ensure that relevant issues that might impact on protected characteristics are considered as proposals for these areas develop. Residents’ Charters set out the rights of residents and those affected by any redevelopment proposals, as well as the Council’s obligations and commitments. The main principles include:

- The requirement for the Council to support a Residents’ Steering Group to act as a body for consultation;
- The provision of information, facts and figures to enable residents to make informed decisions about the future;
- The right for all residents to have access to independent advice paid for by the council throughout the regeneration project;
- Specific commitments to council tenants, leaseholders and freeholders and the options available to them.

5.11.5 These measures should help avoid or mitigate any potential negative impacts on groups with protected characteristics associated with regeneration projects that are included as allocations in the Local Plan.

5.11.6 **Table 5.15** summarises the impact of the draft Local Plan in relation to class or socio-economic disadvantage and groups with protected characteristics.

**Table 5.15 EqIA - Summary of Impact of the draft Local Plan**

Assessment (Please tick the assessment response for each protected characteristic)							
Characteristics	Potential for unlawful discrimination			No potential for unlawful discrimination			
	Negative			Neutral	Positive		
	The policy shows actual or potential unlawful discrimination and needs to be stopped, removed or altered	Policy shows potential for adverse impacts-justification needs to be shown if it continues	Policy needs adjustments to remove barriers and advance equality opportunity	No groups disproportionately affected	Policy eliminates unlawful discrimination	Policy advances equality of opportunity (e.g. through positive action and targeting opportunities to under-represented groups)	Policy advances equality of opportunity and promotes good community relations
	High	Medium	Low	Neutral	Low	Medium	High
Class or socio-economic disadvantage						✓	
Age						✓	
Disability						✓	



Assessment (Please tick the assessment response for each protected characteristic)							
Characteristics	Potential for unlawful discrimination			No potential for unlawful discrimination			
	Negative			Neutral	Positive		
	The policy shows actual or potential unlawful discrimination and needs to be stopped, removed or altered	Policy shows potential for adverse impacts-justification needs to be shown if it continues	Policy needs adjustments to remove barriers and advance equality opportunity	No groups disproportionately affected	Policy eliminates unlawful discrimination	Policy advances equality of opportunity (e.g. through positive action and targeting opportunities to under-represented groups)	Policy advances equality of opportunity and promotes good community relations
	High	Medium	Low	Neutral	Low	Medium	High
Marriage and Civil Partnership						✓	
Pregnancy and maternity						✓	
Race						✓	
Religion / belief						✓	
Sex (gender identity)						✓	
Sexual orientation						✓	
Transgender						✓	

5.11.7 On the basis of the review set out at **Appendix J** and the above it is concluded that the Local Plan exhibits due regard to the Council’s Public Sector Equality Duty. No instances have been identified where the content of policies would give rise to adverse effects on people who share protected characteristics and no groups are disproportionately affected by the policies in the Local Plan. Steps will be taken to ensure due regard to the Public Sector Equality Duty in the process to produce and the policies of the Local Plan as it continues to develop.

5.11.8 The Council’s [Statement of Community Involvement](#) (2022) sets out how the Council will engage and consult with the local community and other stakeholders on planning matters, including preparation of the Local Plan. Consultation activity seeks the views of local people. This includes residents, residents’ associations and local organisations The Council also recognises that there are particular groups that it has been less successful in reaching when engaging and consulting with stakeholders on planning issues. There are also groups who are digitally excluded. Particular effort will be made to reach these



groups when selecting consultation and engagement methods and to mitigate any potential equalities and accessibility issues where they arise.

## 5.12 Key Findings from the HRA

- 5.12.1 Natural England provided comments on the approach to the HRA in their response to the Scoping Report (October 2022).
- 5.12.2 The HRA process has considered the potential for the Local Plan to affect European sites within 20 km of the borough boundary; these sites are:
- Epping Forest Special Area of Conservation (SAC);
  - Lee Valley Special Protection Area (SPA);
  - Lee Valley Ramsar;
  - Wimbledon Common SAC; and
  - Richmond Park SAC.
- 5.12.3 The HRA process is described in **Section 4.6** of this report. The HRA is available as a free standing report.
- 5.12.4 The issues considered in the HRA include:
- Air quality, including ‘in-combination’ effects;
  - Public access / visitor pressure; and
  - Water quality.
- 5.12.5 An initial ‘screening’ exercise (recognising that ‘screening’ conclusions can only be formally reached for the final plan) indicated that the interest features of Epping Forest SAC may be exposed and sensitive to effects from the draft Local Plan ‘in combination’ with other plans and programmes (atmosphere pollution and recreational pressure).
- 5.12.6 The HRA conclusions are necessarily preliminary, being dependent on the future development of the Local Plan refresh and additional data collection. The HRA will be updated in light of comments on this report and the draft Local Plan. It is likely (based on the available data and the policy protections and mitigation included in the draft plan) that a ‘no adverse effects’ conclusion could be reached if the Local Plan Refresh is adopted in its current form. It will be necessary to review any changes that are made to the Local Plan at Regulation 19 and prior to adoption (and following additional data collection in relation to air quality) in order to ensure that the HRA conclusions remain applicable.

## 5.13 Monitoring

- 5.13.1 It is a requirement of the SEA regulations to establish how the significant sustainability effects of implementing the Local Plan will be monitored. However, as earlier government guidance on SEA (ODPM et al, 2005) notes, it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects, including unforeseen adverse effects. Monitoring the Local Plan for sustainability effects can help to answer questions such as:
- Were the predictions of sustainability effects accurate?
  - Is the Local Plan Update contributing to the achievement of desired SA objectives?
  - Are mitigation measures performing as well as expected? and

- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

5.13.2 Monitoring should be focussed on:

- Significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused;
- Significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
- Where there is the potential for effects to occur on sensitive environmental receptors.

5.13.3 As noted in the Scoping Report (October 2022) the 22 IIA Objectives (**Appendix D**) have been linked to the monitoring framework set out in the current Local Plan, which contains a comprehensive set of indicators to be examined through the Authority Monitoring Report (AMR) Bulletins. The AMR is updated via annual topic-based bulletins to provide the most up-to-date baseline picture of Newham across the broad themes of the Local Plan. The AMR bulletins look at a range of economic, social and environmental data, and include analysis.

5.13.4 Integrating monitoring associated with the SEA Regulations with the monitoring framework of the Local Plan is welcomed and it is recommended that this approach continues, as implied by the Scoping Report and inclusion of the current indicators in the IIA Framework.

## 5.14 Recommendations (including Mitigation)

5.14.1 The draft Local Plan is a comprehensive document and no recommendations relating to policy gaps have been identified. The recommendations arising from the IIA at this stage are limited, however additional recommendations may arise as the Local Plan progresses. The Council is not required to accept a recommendation but will be asked to provide a response to each of them. SA is an iterative process and responses received in relation to earlier recommendations provided to the Council are provided in **Table 5.16**. Subsequent iterations of the IIA Report will include a compilation of recommendations and the Council's responses. This will help to document how the IIA has then influenced the evolution of the Local Plan refresh at each stage of preparation.

### Recommendations for Thematic Policies

- 5.14.2 A general recommendation is related to the concept of the 15 minute neighbourhood. This concept is supported but in initial work on the assessment of policies it was suggested that the definition of the boundary of neighbourhoods should take into account the physical barriers in the borough to walking and cycling and how these will impact on the ability to access facilities, services and green infrastructure (particularly play space). It was therefore recommended that detailed boundaries should be drawn up using available tools, such as QGIS and ArcGIS which take account of physical barriers.
- 5.14.3 The second recommendation related to the concept of long-term stewardship and whether or not the 15 minute neighbourhood concept provides the opportunity for local governance and long term stewardship of assets.
- 5.14.4 The third recommendation related to the use of design codes and how these might be used at the neighbourhood level.
- 5.14.5 All of the above could be articulated through BFN1 'Spatial Strategy' and its supporting text.

- 5.14.6 The HIA identified a potential gap in relation to design elements for buildings to minimise the risk of suicide.

**Table 5.16 Recommendations for Thematic Policies**

Topic / Policy	Date	Recommendation	Council's Response	WSP Response
Vision	November 2022	The vision could include the intention to work towards sustainable development, pursuing economic, social and environmental strands in an integrated way.	Disagree. This is part of the NPPF and the wording of the vision embeds this objective already, interpreting how we will deliver it in a Newham context. It is unclear that adding it would result in improved sustainable development.	Response noted.
Community Facilities Policy – CF3	September 2022	SO10: 'Sustainable design' - Policy CF3 could contain the requirement for developments to be designed to be neighbourly and flexible, similar to policy CF2 and CF4.	Disagree. Policy CF3 requires proposals to also meet the requirements of Policy CF2. This is to avoid duplication. CF3 provides additional detail for cultural and leisure facilities.	Response noted.
High Street Policy – HS3	September 2022	SO1: 'Town Centres' - Does Policy HS3 need to clarify how 2c) relating to local SMEs and other organisations would be implemented – what happens if that use vacates the development?	<p>Agree. The policy has also been substantially changed, and now only addresses retail (Ea), restaurants and cafes (Eb) and financial and business services (Ec) to avoid overlaps with Employment and Community Facilities chapters.</p> <p>The specific exclusion from sequential testing is now only in relation to retention or intensification, and would allow in principal:</p> <ul style="list-style-type: none"> <li>• E(c) uses on High streets</li> <li>• Food shops (Ea) on corner plots outside of the 400m catchment of designated centres and parades. Conditions would be used here to limit use to E(a) and the primary sale of convenience goods.</li> </ul>	Noted, revisions address the previous comment.
High Street Policy – HS5	September 2022	SO1: 'Town centres,' - In relation to SO1: 'Town centres,' it is recommended that Policy HS5	Agree. Reference added. The policy point was moved to D7 Neighbourliness to better integrate 'agent of change' considerations.	Noted, revisions address the previous comment.

Topic / Policy	Date	Recommendation	Council's Response	WSP Response
		<p>references the agent of change principle in the policy (rather than the supporting text as this will give it more weight) and the need for any new development to ensure that it does not impact on existing residential uses, similarly, proposals for new residential uses should not affect the ability of existing premises to function.</p>		
High Street Policy – HS8	September 2022	<p>SO16: 'Sustainable transport' - Policy HS8 on visitor accommodation could include a criteria relating to proximity to public transport, e.g. at least PTAL level 4. The reference to areas within 15 minute walking distance of the ExCeL Conference Centre could be expanded to make it clear that the estimate for the walking time should take account of physical barriers and availability of pedestrian crossing points, e.g. along Victoria Dock Road. This would remove uncertainty about the performance of the policy against SO16: 'Sustainable transport.' A minor positive effect (with some uncertainty) is currently identified (see the general recommendation about defining the 15 minute neighbourhood).</p>	<p>Disagree regarding PTAL. It could exclude areas of Royal Docks and Beckton which are suitable for visitor accommodation due to proximity to excel and the airport. The policy uses transport assessment as a proxy for addressing transport impacts and mitigation.</p> <p>Agree regarding walking time calculation – to be provided in Characterisation Study as an appendix and referenced in policy implementation. This is also relevant for implementation of HS1.</p>	<p>Response noted.</p> <p>Noted, revisions address the previous comments.</p>

Topic / Policy	Date	Recommendation	Council's Response	WSP Response
Climate Change Policy – CE1	September 2022	SO9: 'Climate change' & SO10: 'Sustainable design' - Policy CE1 requires development proposals to save resources, minimising consumption, and waste. These matters should be discussed through the design and access statement. We would recommend that the Council requires (in the case of non-residential development) and encourages (in the case of residential development), the use of recognised standards that cover these and other matters, e.g. BREEAM and the Home Quality Mark. In the absence of the use of such standards there is a risk of green wash or delay to applications as applicants are not sure what information they need to include on these matters.	Disagree - through Policy CE2, the Council proposes that developments use an industry recognised assured performance method such as Passivhaus, AECB and BEPIT – to demonstrate compliance with the various policies. Through discussions with our consultants, we do not believe that BREEAM standards or the Home Quality Mark go far enough, or are robust enough to deliver the Climate Emergency targets outlined in the policy.	Response noted. AECB covers heating and cooling, primary energy, renewables, air tightness, thermal bridges and summer overheating, BEPIT is also focussed on energy performance.  BREEAM and Home Quality Mark cover a broader range of issues. However it is noted that the Local Plan also references the use of the Building for a Healthy Life Standards so provides a rounded set of standards.
Climate Emergency – Policy CE2 Zero Carbon Development	September 2022	Should Policy CE2 read 'should target' rather than 'should achieve.'	Disagree, the Climate Change Evidence Base shows that these numbers are achievable, financially viable and that an assured performance method (Passivhaus, AECB, BEPIT) will be used to demonstrate compliance with this.	Response noted.
		There should be a statement clarifying what renewable energy qualifies, presumably heat pumps would be included? At the moment the policy seems focussed on PV.	Disagree, a heat pump is not a renewable energy source – they heat a building (or part of a building) by transferring thermal energy from the outside using the refrigeration cycle. The Climate Change Evidence Base outlines why PVs are the preferred renewable energy source for new development.	Response noted.



Topic / Policy	Date	Recommendation	Council's Response	WSP Response
		In terms of off-site contributions – could these be used to improve fabric efficiency in existing buildings through retrofit works?	Disagree, the Climate Change Evidence Base outlines how the installation of solar PVs is the best use of contributions – as it is measurable and easily deliverable. Retrofitting existing buildings (Council properties or private) is harder to deliver, measure and less cost effective.	Response noted.
Building a Fairer Newham Policy – BFN1	September 2022	The definition of the boundary of neighbourhoods should take into account the physical barriers in the borough to walking and cycling and how these will impact on the ability to access facilities, services and green infrastructure (particularly play space). It is therefore recommended that detailed boundaries are drawn up using available tools, such as QGIS and ArcGIS which take account of physical barriers.	<p>Agree. The proposed boundaries of the neighbourhoods have identified through the Characterisation Study and public engagement at the end of 2021. This included an assessment of 'soft' and 'hard' boundaries for neighbourhoods. Maps of the neighbourhood boundaries will be available in the Draft Local Plan.</p> <p>Please note, as explained in the justification for the neighbourhoods policies – it is not expected that every neighbourhood contains all facilities. Instead all homes are expected to be within 15 mins walking distance of all key facilities – but this may be in their neighbourhood or an adjoining one.</p> <p>This is why many policies have a test to check that loss of a facility won't increase a deficiency in the 15 minute network for that use and that gain of a facility will be in the optimum location to reduce gaps in the network. When undertaking this test, applicants will be required to look at walking and cycling routes and barriers, especially barriers which may impact different groups of people differently.</p>	<p>Response noted.</p> <p>Noted.</p>
Building a Fairer Newham Policy – BFN1	September 2022	The policy could confirm how design-codes might be used at the neighbourhood level.	Agree. This is now addressed via the supporting text to BNF1 in paragraphs 1 and 2 and the relationship between policy BNF1, site allocations and the neighbourhood policy design principles.	Noted, revisions address the previous comment.

Topic / Policy	Date	Recommendation	Council's Response	WSP Response
Building a Fairer Newham Policy – BFN1	September 2022	SO14: 'GBI' - Policy BFN1 could reference the need to address existing shortfalls in open space provision.	Agree. Now captured in the supporting text for BNF1 in paragraph 5.	Noted, revisions address the previous comment.
Building a Fairer Newham Policy – BFN2	September 2022	SO15: 'Biodiversity' - Policy BFN2 could require masterplans to demonstrate how biodiversity net gain will be achieved on site.	Agree. Added to part 2 f.	Noted, revisions address the previous comment.
Transport Policy – T5	September 2022	SO4: 'Employment' - Policy T5 could acknowledge the master plan for London City Airport (2020), which includes proposals to make better use of part of the airport.	Disagree – the Council's view is that the circumstances in which the LCY masterplan was adopted (i.e. contrary to the position of Newham, GLA and most local residents who responded to the consultation) the amount of weight that should be given to the masterplan for plan-making and decision-making is fairly limited, albeit it is still given consideration.	Response noted.
Transport Policy – T5	September 2022	SO4: 'Employment' - Policy T5 could be explicit as to whether or not an increase in passenger numbers would be allowed within the plan period. The masterplan notes that the current limit on passenger numbers (6.5 m/annum) is likely to be reached before the limit on annual aircraft movements (111,000 annual limit).	Agree, the policy T5's implementation text is now explicit regarding this.  An increase to passenger numbers is likely to only be possible with a change to the respite period. The policy is explicit that a change to the respite period is something that we would not support. Larger aircraft are not possible due to the steep ascent/descent required to access LCY.	Noted, revisions address the previous comment.  Response noted.
Design	November 2022	The HIA Framework includes a criteria relating to design elements to minimise the risk of suicide. The Local Plan could include policy guidance in this respect, for example	Disagree. Design policies seek to create a built environment that fosters positive mental health. Balconies (policy H11) will include elements of safety in line with building regulations, but unreasonable to go further as this would generate an oppressive	Response noted.

Topic / Policy	Date	Recommendation	Council's Response	WSP Response
		for tall buildings that include a viewing area that is open to the public or any buildings over 4 storeys that include a balcony.	environment that is unlikely to reduce suicide rates. Tall building Policy D4 relies on London Plan 2021 Policy D9 criteria that includes relevant guidance: "Well-designed safety measures should be integrated into the design of tall buildings and must ensure personal safety at height."	

## Recommendations for Neighbourhood Policies

- 5.14.7 Recommendations are presented in **Table 5.17**. There are some common themes across neighbourhoods, and these have been grouped to avoid repetition.

**Table 5.17 Recommendations for Neighbourhood Policies**

<b>Sustainability Objective</b>	<b>Recommendation</b>	<b>Council's Response</b>	<b>WSP Response</b>
SO1: 'Town centres'	Policy N6 Manor Road could make specific reference to the need to improve the centres of the neighbourhood connectivity to existing centres adjoining the area?	Agree to make reference to connectivity to the Twelvetees local centre in the Three Mills neighbourhood.	Noted.
SO3: 'Place-making.'	Heritage assets are highlighted in some neighbourhood policies but not all. For example Policy N6 'Manor Road' could highlight the need to protect local assets, including the West Ham Memorial Garden and N10 'Plaistow could highlight the need to preserve the settings of listed buildings within the neighbourhood?  Policies could highlight those areas that are within Archaeological Priority Areas.	Agree to make reference to Archaeological Priority Areas in the neighbourhood profiles. Agree to make reference to conserving heritage assets in all neighbourhood policies where heritage assets exist.	Noted.
SO6: 'Education'	The supporting text could clarify if / how future educational needs will be accommodated in those instances where the need for new schools is not identified, this includes N2 'North Woolwich' and N12 'East Ham South.'	Disagree. The neighbourhood policies set out where sites are allocated based on the need set out in the council's Pupil Place Planning Report. The overall approach to planning for the need for school places and how this will be dealt with over the plan period is set out in CF4 and its supporting text.	Noted.
SO9: 'Climate change'	Given the scale of development envisaged within neighbourhoods, especially those that sit within larger Opportunity Areas, the policy could highlight the potential for district heating or other specific opportunities to reduce reliance on fossil fuels?	Disagree. The neighbourhood policies work alongside Climate Change policies which deal with the requirements for district heating and decarbonisation of existing networks before expansion and the requirements for zero carbon development.	Noted.

Sustainability Objective	Recommendation	Council's Response	WSP Response
SO9: 'Climate change'	In the case of N1 'Gallions Reach' is there opportunity to incorporate the wastewater treatment works in any solution, e.g. through use of sludge anaerobic digestion to produce biogas and/or generate electricity?	This can be reviewed if further information is provided by Thames Water.	Noted.
SO11: 'Natural resources'	Neighbourhood policies could highlight the need to improve air quality in air quality focus areas and the need to promote air quality positive development? This is highlighted in some neighbourhood policies but not all.	Disagree – all neighbourhood policies reference air quality and Air Quality Focus Areas are referenced where they exist in the neighbourhood.	Noted.
SO11: 'Natural resources'	Development in all of the neighbourhoods will generate additional waste. Is there a need for any specific proposals around waste management in the areas, e.g., in relation to circular economy principles and supporting a green economy?	Disagree – this is dealt with Local Plan policies W1, W2 and W3.	Noted.
SO11: 'Natural resources'	In the case of N1 'Gallions Reach' and optimising the use of land, the safeguarded area for the Thames crossing runs through the site – should the neighbourhood policy say more about how the safeguarded area should be taken into consideration in the development of future proposals and anticipated timescales for release of this safeguarding?	Disagree – this is set out in the site allocation for Beckton Riverside so does not need to be in the neighbourhood policy.  The release of the safeguarding rests with the Secretary of State. LB Newham's view, which has been shared with Transport for London and Homes England is that this should only occur once funding for the DLR crossing is secured. Is this considered clear enough in the site allocation?	Noted.
SO12: 'Flood risk'	The Royal Docks and Beckton Riverside Opportunity Area OAPF recommends the delivery and monitoring of an Integrated Water Management Strategy. Should this be highlighted in relevant neighbourhood policies as well to ensure that it is taken forward?	Disagree – the Integrated Water Management Strategy is an emerging document and is dealt with in Local Plan policy CE7. The neighbourhood policies will be reviewed in the future to assess	Noted.



Sustainability Objective	Recommendation	Council's Response	WSP Response
		whether the policy should reference any of its recommendations.	
SO12: 'Flood risk'	All neighbourhoods - The Local Plan policy could highlight the need for development to contribute to the improvement of flood defences and highlight any specific forms of flood risk that need to be addressed within the area.	Disagree – flood defences are a strategic matter dealt with in Local Plan policy CE7.  Development and design principles in the site allocations address site specific flood risk. Both the neighbourhood policies and site allocations will be further reviewed once the SFRA is complete.	Noted.
SO14: 'GBI'	N4 Royal Albert North - Is a specific open space allocation warranted or feasible in this area?	Agree – this is a requirement of the site allocation for Royal Albert North and has been added to the neighbourhood policy.	Noted.
SO15: 'Biodiversity'	Consider the need for policies to identify the need for an ecological management plan across the neighbourhood area in those instances where biodiversity is likely to be more sensitive, including measures to raise public awareness and education and the need to protect designated areas. For example, Policy N1 could highlight the need to enhance the River Roding and the Beckton Creekside Nature Reserve (issues raised in the IIA for the OAPF).	Partial disagree – would duplicate management plan and survey requirements of green infrastructure policies (GSW1, GSW2 and GSW3) for management plans and surveys. Reference to enhancing biodiversity along the River Roding has been made more explicit in the relevant policies.  River Roding has been made more explicit in policy N1 and is referenced in the other relevant neighbourhood policies.	Noted.
SO15: 'Biodiversity'	Do any of the areas of previously developed land in the neighbourhood areas have potential to support specific	This will be reviewed between Reg 18 and Reg 19 using the evidence in the Green Infrastructure Study to	Noted.

Sustainability Objective	Recommendation	Council's Response	WSP Response
	habitats and species that should be highlighted in the Local Plan for protection/enhancement?	add any relevant detail to the neighbourhood profiles and the policies themselves where relevant.	
SO16: 'Sustainable transport'	In relation to Policy N1 'Gallions Reach' would an indication of when the new DLR station is anticipated to be operational be helpful and is there scope for an interim alternative service, e.g. shuttle to Gallions Reach DLR station?	Disagree – this is addressed through the site allocation for Beckton Riverside through the phasing of the site. i.e. development nearest Gallions Reach DLR will be allowed to come forward in advance of the DLR. other development will have to be delivered alongside the new DLR station,	Noted. Arguably the neighbourhood policies should be flagging issues that the site allocations then respond to? Key thing is that it is addressed somewhere.
SO16: 'Sustainable transport'	Would an indication of when the improvements to Stratford station is anticipated to be operational be helpful?	This will be addressed through the site allocation for Stratford Station and will be further refined when timescales are known.	Noted.
SO18 'Community facilities'	Some policies were silent on the provision of new community facilities, including Policy N6 Manor Road. The policy or supporting text could comment on the extent to which existing facilities are considered adequate. North Woolwich, Manor Road, West Ham, Plaistow, Green St, Forest Gate and Manor Park and Little Ilford do not reference school provision.	Disagree – the policies reference community facilities where relevant, and should be read alongside other Local Plan policies relating to community facilities. Manor Road is an industrial and employment neighbourhood and any provision of community facilities would be assessed against the relevant Local Plan policies.  No need for additional schools have been identified in those neighbourhoods.	Noted. We are suggesting that were no need has been identified this is confirmed in the policy – just so that people are aware of what is being planned for but appreciate this may not be appropriate.
SO22: 'Health and wellbeing'	In relation to Policy N1 'Gallions Reach' - Consider whether the assessment of odour, noise and air quality needs front loading with further consideration given to these considerations through development of the Local Plan in order to ensure that the proposed scale of	Disagree – these are factors that have been considered as part of design-led approach to the site allocation and an odour assessment is required as part of the utilities	Noted.

Sustainability Objective	Recommendation	Council's Response	WSP Response
	development is deliverable and to optimise the use of land in relevant locations. For example, the draft OAPF for the Royal Docks and Beckton Riverside identifies that strong smells from the wastewater treatment works reach the Gallions Reach area – can these be mitigated?	policies. Further information engagement needed Thames Water to be able to undertake an odour assessment. The policy can be reviewed once this information is available.	
SO22: 'Health and wellbeing'	Some policies were silent on the provision of new health facilities – the policy or supporting text could comment on how needs will be met, examples include N4 Royal Albert North and N5 Canning Town.	Disagree – sites have been allocated for health centres based on NHS needs which are referenced in the relevant neighbourhood policies. This can be reviewed if additional need is identified by the NHS. N5 references the health centre at Custom House Phase 1.	Noted. Perhaps the approach needs to be made explicit in the supporting text, just to remove any uncertainty.

## 6. Conclusions and Next Steps

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### 6.1 Introduction

6.1.1 This section briefly summarises the key conclusions from the report and sets out the next steps, including details of how to comment on this report.

### 6.2 Key Conclusions Emerging from the Appraisal and Plan Making Process

6.2.1 The draft Local Plan and supporting information seek views on the following:

- Vision and objectives;
- Spatial strategy;
- The role of neighbourhoods;
- Quantum of Employment Land for Industrial Uses;
- Thematic policies, including consideration of reasonable alternatives; and
- Site allocations, including consideration of reasonable alternatives.

6.2.2 This report provides an assessment of each of these elements of the draft Local Plan and also considers the potential for cumulative and synergistic effects.

6.2.3 The Newham Local Plan sets out the spatial strategy for Newham for a fifteen-year period between 2023 and 2038. The spatial strategy identifies the location, scale and uses of development that will come forward in Newham and demonstrates how needs of Newham's current and future population will be met. This includes the need, set by the London Plan 2021, to deliver at least 47,600 additional homes in Newham over the period 2019/20 to 2028/29. The Newham Local Plan also seeks to meet Newham's needs for:

- a requirement for 335,00 sqm of industrial floorspace;
- a minimum requirement for 90,000 of office floorspace; and
- 25,973sqm of retail floorspace.

6.2.4 The draft Local Plan Update seeks to meet the identified housing and employment needs. The preferred spatial strategy is to direct significant levels of growth to neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area, neighbourhoods along the River Lea which form part of the cross boundary Poplar Riverside Opportunity Area and to the Stratford and Maryland neighbourhood, supported by a redesigned Stratford Station, with incremental change in other neighbourhoods, with 16 neighbourhoods based on the 15 minute neighbourhood principle.

6.2.5 The draft Vision is compatible with the SA objectives. The Local Plan adopts the objectives from the Building a Fairer Newham Strategy. Including these objectives in the Local Plan will help to ensure that it contributes to the achievement of local priorities.

6.2.6 The draft Local Plan contains a suite of policies that seek to:

- Create a network of 15 minute neighbourhoods to ensure everyone has access to the services and facilities they need, contributing to a more sustainable pattern of development;
  - Provide a range of housing (especially affordable housing), including housing for older people and other specialist needs;
  - Expand Newham's economy by providing space for employment in suitable locations;
  - Retain economic benefits within Newham so economic growth benefits its residents, rather than being lost to the borough;
  - Protect existing areas identified for industrial and employment use, whilst still allowing mixed-use sites to be developed to ensure there is sufficient flexibility in appropriate sites;
  - Create a network of centres, including the protection of existing town centres, local centres, small parades and local shops and see their expansion where appropriate;
  - Achieve high quality design – through policies that require masterplanning that creates inclusive communities and ensures that account is taken of the how new development relates to existing uses;
  - Provide sufficient social community, education and health services and facilities;
  - Protect and enhance Green and Blue Infrastructure to address existing shortfalls in provision, including the provision of play space;
  - Encourage more sustainable forms of transport, especially active travel methods;
  - Manage resources, including minerals and waste more sustainably; and
  - Mitigate the borough's contribution to climate change whilst ensuring that new development adapts to changes that are already anticipated, especially with regard to flood risk and overheating.
- 6.2.7 The IIA has identified the potential for the vision, objectives, policies and allocations to make a significant positive contribution to a range of economic, social and environmental factors.
- 6.2.8 The policies in the Regulation 18 Local Plan are anticipated to have positive effects across all of the IIA objectives. These effects are expected to be particularly significant in respect of: housing (SO8: 'Housing supply'), neighbourhoods (SO2: 'Neighbourhoods'), employment (SO4: 'Employment'), education (SO6: 'Education'), open spaces (SO14; 'GBI'), transport (SO16: 'Sustainable transport'), community facilities (SO18: 'Community facilities'), health and well-being (SO22: 'Health and wellbeing').
- 6.2.9 This reflects the likely socio-economic benefits brought about by the draft Local Plan's 15 minute neighbourhood concept and how it seeks to ensure the borough's residents have access to employment, leisure, health and community facilities over the plan period. The draft Local Plan would help deliver new housing, employment and health and community facilities. This would be achieved whilst protecting the borough's remaining open/green spaces and natural assets, ensuring new development is well-designed and climate conscious. The draft Local Plan's Site Allocations would provide clear benefits to the borough through providing much needed housing, employment and services and facilities over the plan period.
- 6.2.10 Whilst the draft Local Plan performs well against the IIA objectives, some potential for significant negative effects has been identified. Newham due to its location and existing built environment experiences flood risk issues, which the new development required by

the draft Local Plan would have to contend with. This led to certain aspects of the draft Local Plan scoring a significant negative against IIA objective 12 (primarily the allocated sites). The need to strengthen existing flood defences is recognised in the Local Plan and no additional mitigation is suggested. Similarly, the Local Plan contains policies to mitigate potential significant effects in relation to heritage (SO3: Place making).

- 6.2.11 Development, particularly of the scale envisaged in Newham will inevitably mean an increase in the use of resources and energy during the construction and operational phases of development. These negative effects have already been account for through consideration of the London Plan 2021 and planning for the Opportunity Areas. The Local Plan is responding to the requirement for housing set out in the London Plan 2021 and Opportunity Area Planning Frameworks. The potential for significant negative effects in relation to SO9: Climate change and SO11: Natural resources. The draft Local Plan sets out policies to ensure that development is net zero carbon and seeks to support and enable local supply chains. The Joint Waste Local Plan will include additional policy in relation to the management of waste.
- 6.2.12 The London Plan 2021, as the Spatial Development Strategy for Greater London, provides additional policy to help address potential significant negative effects. These include the requirement for new development to be at least air quality neutral (London Plan Policy 2021 SI 1) and for development to be net zero-carbon (London Plan Policy SI 2).

## Health Impact Assessment

- 6.2.13 The extent to which the draft Local Plan policies will contribute to each of the priorities identified in the HIA Framework has been considered. Overall, the HIA identifies that the policies in the draft Local Plan will make positive contributions against the topics considered, one potential gap in relation to the design of buildings to reduce the risk of suicide was identified and a recommendation has been made, suggesting that the Local Plan incorporate a suitable criterion in one of the design policies.

## Equalities Impact Assessment

- 6.2.14 The Council has developed an EqIA Framework which guides the EqIA of the draft Local Plan and later versions of the document.
- 6.2.15 The Local Plan Update is a borough-wide document that will potentially impact on all of those who live, work and visit the Borough. Based on a desk top review of the content of the draft Local Plan no instances have been identified where the content of policies would give rise to adverse effects on people who share protected characteristics.
- 6.2.16 There are policies in the draft Local Plan which, while not focussed on people who share Protected Characteristics, could have significant positive effects. These include policies relating to the provision of a range of housing, employment (e.g. J1 'Employment and Growth', green infrastructure (e.g. GWS1 'Green spaces'), transport (e.g. T2 'Local Transport') and community infrastructure.
- 6.2.17 It is also important to note that the Council undertakes EqIAs for regeneration projects that involve sites that are proposed to be allocated in the Local Plan, including Canning Town and Custom House and Carpenters Estate. This should help ensure that relevant issues are considered as proposals for these areas develop. Residents' Charters set out the rights of residents and those affected by any redevelopment proposals, as well as the Council's obligations and commitments.



- 6.2.18 On the basis of the review set out at Appendix J and the above it is concluded that the Local Plan exhibits due regard to the Council's Public Sector Equality Duty. Steps will be taken to ensure due regard for the nine protected groups is embedded in the process to produce and the policies of the Local Plan as it continues to develop.

## Habitats Regulations Assessment

- 6.2.19 The HRA is being undertaken as an iterative process. A draft HRA Report has been prepared to accompany the Regulation 18 draft Local Plan. This will be updated as the evidence base for the Local Plan develops, particularly in relation to transport related emissions to air.
- 6.2.20 An initial 'screening' exercise (recognising that 'screening' conclusions can only be formally reached for the final plan) indicated that the interest features of Epping Forest SAC may be exposed and sensitive to effects from the draft Local Plan 'in combination' with other plans and programmes (atmosphere pollution and recreational pressure).
- 6.2.21 The HRA conclusions are necessarily preliminary, being dependent on the future development of the Local Plan refresh and additional data collection. The HRA will be updated in light of comments on this report and the draft Local Plan. It is likely (based on the available data and the policy protections and mitigation included in the draft plan) that a 'no adverse effects' conclusion could be reached if the Local Plan Refresh is adopted in its current form. It will be necessary to review any changes that are made to the Local Plan at Regulation 19 and prior to adoption (and following additional data collection in relation to air quality) in order to ensure that the HRA conclusions remain applicable.

## Recommendations

- 6.2.22 A set of recommendations have been provided and are set out in **Section 5.14**. The Local Plan is being updated in the context of the revised London Plan 2021 and the current Local Plan was adopted in 2018. The draft Local Plan is being refreshed in a mature policy landscape. This means the opportunities for recommendations are more limited. The assessment is an iterative process and a number of detailed recommendations made earlier in the process have been considered by the Council. Recommendations to date have included suggested changes to the wording of policies, e.g. a suggested change to BFN1 to confirm how design codes would be used at the neighbourhood level was incorporated in the Local Plan.

## 6.3 Next Steps

- 6.3.1 This IIA Report is being issued for consultation alongside the Regulation 18 draft Local Plan. The findings of the IIA Report, together with consultation responses and further evidence base work, will be used to help refine the Local Plan prior to consultation on the Regulation 19 draft Local Plan Update. The findings of the IIA Report, together with consultation responses on the Regulation 19 draft Local Plan Update and any further evidence base work, will be used to help refine the Local Plan prior to submission (as the Regulation 22 Local Plan) to the Secretary of State who will appoint an Inspector to carry out an independent examination. This process is dealt with by the Planning Inspectorate. The Inspector will conduct an independent examination as to whether the Local Plan is sound and meets all relevant legal requirements. The criteria for soundness are whether the Plan's policies are positively prepared, justified, effective and consistent with national policy.
- 6.3.2 Following the examination, and depending on the recommendations of the Inspector, further modifications to the Local Plan Update may be required. Any significant changes

to the draft Local Plan Update may require further appraisal and consultation. Following this, the Council will seek to adopt the final Local Plan Update. Concurrent, or as soon as is reasonably practicable after the adoption of the Local Plan Update, the Council will issue a Post Adoption Statement (PAS). The PAS will set out the results of the consultation and SA process and the extent to which the findings of the SA have been reflected in the adopted Local Plan.

- 6.3.3 Once adopted, the Council will monitor its implementation and any significant social, economic and environmental effects.

## 6.4 Quality Assurance

- 6.4.1 This Report has been prepared in accordance with the relevant requirements of the SEA Regulations. A Quality Assurance Checklist is presented at **Appendix A**. This will be updated in later versions of this Report.

## 6.5 How to Comment on this IIA Report

- 6.5.1 This IIA Report has been issued for consultation alongside the draft Regulation 18 Local Plan. The Council's [website](#) provides details on the Local Plan review and the current consultation.

