

Non-Technical Summary

Introduction

This document is the Non-Technical Summary (NTS) of the Integrated Impact Assessment (IIA) of the Regulation 19 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 Regulation 19 draft Local Plan, 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 subsequent assessment;
- **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: Assessment 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 IIA 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:

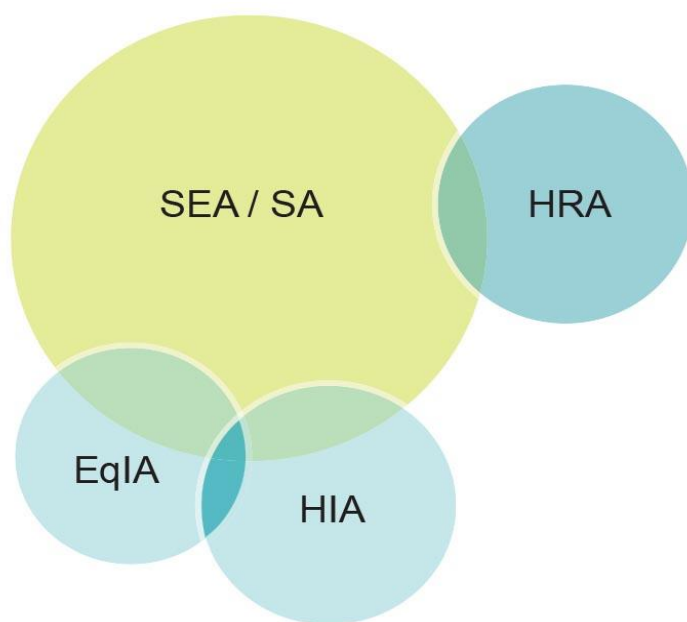
- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) – that consider the potential for significant economic, social and environmental effects;
- Health Impact Assessment (HIA), which focusses on health and well-being and how the Draft Local Plan contributes to these;
- Equalities 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.

The Council undertook a second consultation on the draft Local Plan (Regulation 18) between January and February 2023. This was accompanied by a draft IIA Report dated December 2023.

Table NTS.1 SA Objectives

Sustainability Objective	Short hand
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
SO5: Ensure that economic benefits are retained within the borough following Community Wealth Building principles	SO5: Economic benefits
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.	SO6: Education
SO7: Improve the existing housing stock in the borough	SO7: Housing stock
SO8: Increase the supply of housing, choice and quality of affordable housing in the borough	SO8: Housing supply
SO9: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	SO9: Climate change
SO10: Ensuring high standards of sustainable design are achieved in the built environment.	SO10: Sustainable design
SO11: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.	SO11: Natural resources
SO12: Avoid, reduce and manage all forms of flood risk	SO12: Flood risk
SO13; Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	SO13: Land quality
SO14: Address existing open space deficiencies and improving existing green & blue infrastructure and open spaces.	SO14; GBI
SO15: Protect, enhance and increase biodiversity, habitats and species in the borough	SO15: Biodiversity
SO16: Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road.	SO16: Sustainable transport
SO17: Reduce amount of waste sent to landfill and increase reuse, recycling, and recovery.	SO17: Waste
SO18: Provide quality community facilities and infrastructure in the right location for residents.	SO18: Community facilities

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

This report considers policies and proposed allocations in the Regulation 19 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.
--	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

Significance of effect		Description of effect
		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 to Date

Spatial Strategy

The council identified four options relating to the spatial strategy, which were assessed in the December 2022 IIA Report, which accompanied the Regulation 18 draft Local Plan. The options for the spatial strategy related to the role that different parts of the Borough would play in accommodating future growth.

The options also included consideration of how many neighbourhoods should be identified in the Local Plan. The Regulation 18 Local Plan identified 16 neighbourhoods and the IIA Report (December 2023) assessed this option and alternative approaches, including continuing the approach in the Adopted Local Plan. In response to comments received on the Regulation 18 Local Plan, the Council has decided to plan on the basis of 17 neighbourhoods. Previously Canning Town and Custom House were identified as one neighbourhood but these have now been separately identified as neighbourhoods in their own right. The work undertaken at Regulation 18 stage has been updated in this report to reflect the move from 16 to 17 neighbourhoods. The additional granularity will clearly have benefits for the neighbourhoods concerned but does not impact significantly on the previous assessment of options.

The Regulation 18 Local Plan adopted the term '15 minute neighbourhoods,' the Regulation 19 Local Plan adopts the term 'a network of well-connected neighbourhoods' noting that the Local Plan's strategy is underpinned by the concept of creating well-connected neighbourhoods, through which every resident in Newham can live in a well-connected, accessible and inclusive neighbourhood which provides their social, civic and economic essentials, often within a 15 minute walk or cycle. This recognises the importance of improved local facilities and will reduce the need to travel to access these facilities and services, especially by methods that pollute our streets.

The Local Plan makes it clear that the strategy is not intended to create isolated and self-sustaining areas but to support access to services and facilities for everybody. Newham's well-connected neighbourhoods therefore form part of a wider network of well-connected neighbourhoods, which give residents a choice in where they access different facilities and services, whether that is within their own neighbourhood or within the wider network. It also

supports the delivery of a just transition to resilient, connected and green neighbourhoods across the borough. This IIA Report therefore adopts the term ‘a network of well-connected neighbourhoods’ and assesses the approach having regard to the stated intentions set out in the Local Plan.

The options considered 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 17 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 the principle of providing a network of well-connected neighbourhoods.
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.

Each option was 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	++/?	++/?	++/?	++/?

Sustainability Objective (SO)	Option 1	Option 2	Option 3	Option4
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	+	+	+	+

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 17 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 provision of a network of well-connected neighbourhoods.

The approach to planning for a network of well-connected neighbourhoods

The reasonable alternatives identified by the Council that were assessed in the December 2022 IIA Report and refined as set out above at Regulation 19 stage are summarised in **Table NTS.5**.

Option	Description	Reason for consideration
1	Creating a network of well-connected 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 neighbourhood network.	Proposed approach in the Draft Local Plan.
2	Maintain town centre first approach without looking to fill the gaps in the neighbourhood 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 network of neighbourhoods	Firmer adherence to the principle of a network of well-connected neighbourhoods , 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 a network of well-connected neighbourhoods

Sustainability Objective (SO)	Option 1	Option 2	Option 3
SO1: Town Centres	++	++	++/?
SO2: Neighbourhoods	++	++	++
SO3: Place-making	+/?	+	+/?
SO4: Employment	++	++	++
SO5: Economic benefits	++	++	++

Sustainability Objective (SO)	Option 1	Option 2	Option 3
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	~	~	~
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 (because of a greater emphasis on providing a network of well-connected neighbourhoods), 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 would 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 network of well-connected neighbourhoods. 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 deliver the Council’s objective for residents to live in well-connected 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 that were assessed in the December 2022 IIA Report 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	~	~	~
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 that 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. Providing new floorspace outside of London would displace some of the effects identified at the local level, 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 Regulation 19 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 Regulation 19 draft Local Plan cover a wider range of economic, socio-economic and environmental themes and are adapted 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;
- Social Infrastructure;
- Economy;
- Homes;
- Green and Water Spaces;
- Climate and Flood;
- Transport;
- Waste and Utilities,

As noted above the consideration of reasonable alternatives included consideration of thematic policies. Throughout the course of developing the Local Plan, officers identified various options for each of the policy themes that the Local Plan considers, some of these are very detailed in nature. These were discussed with the IIA team and consideration was given to whether or not these needed to be treated as reasonable alternatives for the purposes of the assessment. Examples of this work included 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. Work on this element of the IIA is recorded in **Table E1** at **Appendix E**.

In the majority of instances it was concluded that the options did not need to be treated as reasonable alternatives and the reasons for this are set out in **Table E1**. However, reasonable alternatives were considered for the following:

- Policy D3: Design-led site capacity optimisation;
- Policy HS5: Visitor Evening and Night Time Economy;
- Policy SI2: New and re-provided community facilities and health care facilities;
- Policy J4: Community Wealth Building and Inclusive Growth;
- Policy H2: Protecting and Improving Existing Housing;
- Policy H6: Supported and Specialist Housing;
- Policy H8: Purpose Built Student Accommodation;
- Policy H9: Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living;
- Policy H11: Housing Design Quality;
- Policy GWS5: Play and informal recreation for all ages;
- Policy CE2: Zero Carbon Development.

Results are presented in **Appendix E**. There are no instances where reasonable alternatives were judged to perform better than the proposed approach.

This report concludes that the Regulation 19 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 well-connected 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’;

- Seeking to deliver between 51,425 and 53,784 new homes by 2038 and providing a range of housing (especially affordable housing), including housing for older people and other specialist needs and an affordable housing target of 50% social rent on each site 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 and encouraging the circular economy, 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’;
- Designating tall building zones, as per the requirements of the London Plan (2021), to deliver more suitably sized and located tall buildings which complement the existing townscape and are located near transport and local facilities;
- Providing sufficient social community, education and health services and facilities including the allocation of land for seven new schools, including two Special Educational Needs and Disabilities schools, health centres, leisure centres and parks. 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 Water 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 with an ambitious policy approach to delivering zero-carbon development by requiring buildings to reduce their energy requirements significantly and generate energy through onsite solar panels. Further requirements to increase consideration of embodied carbon and the circular economy have been added, following the Regulation 18 consultation. The Local Plan also seeks to ensure 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 accounted 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 Regulation 19 draft Local Plan identifies 17 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**. No options or reasonable alternatives were identified in relation to the neighbourhood policies.

The Council identified 45 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. The process outlined above meant that no reasonable alternatives in terms of sites were identified. Consideration was given as to whether or not the IIA should consider alternatives for the mix of uses on site but this was discounted because the mix of uses proposed on each site reflects the Council's objectives for that site and wider evidence base, for example on the need for employment land, retail floorspace, health, education and community facilities.

Between the Regulation 18 Local Plan and the Regulation 19 Local Plan, two additional sites have been added to the Local Plan and one site has been removed:

- N2.SA5 Excel Western Entrance was allocated following reconsideration of impact on open space.
- N11.SA3 Alpine Way was allocated following updated evidence from the landowner on availability.
- N14.SA1 Queen's Market has been removed due to the on-going work the Council is undertaking with the local community as part of the Queen's Market and Hamara Ghar Investment Strategy. As this work is on-going, the Council does not yet have certainty on which development option is being progressed by the Council, as the landowner has to be able to demonstrate the site is deliverable. 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 London Legacy Development Corporation (LLDC) Local Plan.

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 well-connected 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 because the Local Plan does not specify the capacity at each site.

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, with relevant policies amended between Regulation 18 and 19 following consultation 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	Social Infrastructure	Design	Green and Water Spaces	Economy	High Street	Homes	Climate Change	Transport	Waste and Utilities	Neighbourhood polices
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	Social Infrastructure	Design	Green and Water Spaces	Economy	High Street	Homes	Climate Change	Transport	Waste and Utilities	Neighbourhood polices
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 2021 IIA Scoping Report presented the Framework for the HIA. It was structured around the 12 Priorities set out in Newham's Health and Wellbeing Strategy and drew on NHS London Healthy Urban Development Unit's (HUDUs) HIA methodology.

The HIA has been updated to reflect changes to the policy context. [Newham's Health and Wellbeing Strategy \(2024\)](#) sets out 50 steps to improve health and wellbeing over the next three years. The Council is also developing guidance on undertaking Social Value and Health Impact Assessment (SV-HIA), combining a traditional HIA with additional criteria specifically looking at the social value. The HIA for the Local Plan has been updated to reflect this change in approach and to reflect the local priorities and relevant steps (as identified by members of the Local Plan team) set out in the updated Wellbeing Strategy.

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. A potential gap in relation to the design of buildings to reduce the risk of suicide was identified at Regulation 18 stage but, following feedback from the Council it was agreed that the London Plan provides sufficient policy coverage in respect of this. 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 updated EqIA Framework and additional baseline data on protected characteristics which guided the EqIA of the Regulation 19 draft Local Plan and will be used to assess any further changes to the Local Plan. **Section 4.6** of this report provides more information on the approach to the EqIA. The EqIA Framework has been prepared in the context of the overall vision for Newham, which is set out through the eight key priorities of the [Building a Fairer Newham Strategy](#).

As with all parts of the IIA, the EqIA is a high level assessment that acknowledges the wide ranging scope and scale of Local Plan policies but that the detailed nature of permissible projects under the policies is unknown and it is therefore challenging to assess all potential impacts. The EqIA has to strike a proportionate balance using the best available data.

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. These arrangements will help ensure that due consideration is given to potential impacts on Protected Characteristics.

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) and in their response to consultation on the Regulation 18 Local Plan.

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 4.7** of this report and with findings summarised in **Section 5.12**. 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.

Overall, the assessment of the Regulation 19 draft Local Plan has concluded that most aspects of the plan will have no significant effects on any European sites, alone or in combination due to the absence of effect pathways.

Appropriate assessments have been undertaken for those aspects where effect pathways are present (in combination air quality and visitor pressure effects on Epping Forest SAC), taking into account specific and cross-cutting policy-based mitigation and avoidance measures that have been incorporated into the plan. These appropriate assessments have employed additional analyses and data to resolve uncertainties present at the initial screening, and have concluded that (as currently drafted) the Regulation 19 draft Local Plan will have no adverse effects on the integrity of any European sites, alone or in combination.

This conclusion is obviously preliminary: it will be necessary to review any changes that are made to the Local Plan as it proceeds to ensure that these initial HRA conclusions remain applicable, and the HRA will also be reviewed and updated as the Local Plan and its evidence base is developed further.

Next Steps

This IIA Report has been issued for consultation alongside the Draft Regulation 19 Local Plan refresh. The Council's [website](#) provides details on the Local Plan review and the current consultation.