

## Appendix 17: Climate Emergency Comments

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-050	Anchor	Reg18-E-050/029	Climate Emergency	CE1 Environmental design and delivery						<p>These policies exceed the optional standards set out in building regulations and are therefore inconsistent with national policy; both the Written Material Statement of 2015 and Planning Practice Guidance confirm (as highlighted in the Worthing Local Plan Inspector’s Report) that local energy performance standards can’t be set above the equivalent for Code for Sustainable Homes Level 4.</p> <p>As demonstrated by the Viability Assessment, these requirements will also significantly increase development costs (through higher build costs and commuted sums) which will impact on development viability and housing delivery. The policies are therefore not effective.</p>	<p>This wording change has not been made. The Written Ministerial Statement of 2015 was superseded in December 2023, and we do not consider that changes the ability for councils to set their own standards. Both the Climate Change Evidence Base and the Viability assessment indicate how the policy is achievable, deliverable and viable.</p>
Reg18-E-070	Aston Mansfield	Reg18-E-070/101	Climate Emergency	CE1 Environmental design and delivery						<p>0.9 CLIMATE EMERGENCY</p> <p>a. CE1: Environmental Design and Delivery - Would you keep, change or add something to this policy?</p> <p><i>3. Development should remediate contaminated land.</i></p> <p><b>Object:</b> Policy as worded implies responsibility to remediate land lies with development. The policy as worded will act to hinder development being approved as it requests costly works to be completed.</p> <p><b>Suggested change to wording</b></p> <p><i>3. Development on land where</i></p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as developers must remediate land as necessary.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										contamination is identified should work alongside the council to provide a remediation strategy which must demonstrate that the land is to be made fit for its intended purpose. [Delete: remediate contaminated land.]	
Reg18-E-143	Canal and River Trust	Reg18-E-143/015	Climate Emergency	CE1 Environmental design and delivery						Page 232 - Climate Emergency Waterways can support the prevention of climate change through urban cooling, biodiversity enhancement, surface water drainage, heating and cooling of waterside developments, and as such are an asset to be identified as such and improved. Water courses are highlighted in the GLA's "Cool spaces" strategy as places where Londoners can take respite on hot days. CE1.1 could refer to making use of watercourses for heating and cooling (which is more efficient than air-source cooling) and enhancing waterways as cool spaces to dwell on hot days, etc.	This wording change has been made. Please see the new wording in CE1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/090	Climate Emergency	CE1 Environmental design and delivery					CE1.5 P.235 CE1 Environmental design and delivery – Implementation CE1.5 ‘Major developments, and developments that have a high-water usage (such as hotels, hostels or student accommodation) should include a grey water and rainwater harvesting system.’ Comment: We suggest that the Council look at requiring the inclusion of a gravity-fed, automated water-recycling system for flushing toilets, subject to the system being proven and receiving the necessary certification within the UK during the ten-year period of Newham’s Local Plan. We are also aware that there we need to be a determination made with regard to who would be responsible for the maintenance of such a system prior to seeking planning approval.	This wording change has not been made. We did not consider this change to be appropriate as Policy CE1 sets consumption target of 105 litres or less per head per day for residential development. Developers can choose how they wish to reduce water consumption in their development.	
Reg18-E-133	Climate You Change	Reg18-E-133/091	Climate Emergency	CE1 Environmental design and delivery					Could there be a mandatory requirement for shower heads with advanced air-induction technology, plus dual flush and pressure assisted toilets to reduce water consumption?	This wording change has not been made. We did not consider this change to be appropriate as Policy CE1 sets consumption target of 105 litres or less per head per day for residential development. Developers can choose how they wish to reduce water consumption in their development.	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/092	Climate Emergency	CE1 Environmental design and delivery						Where white goods are supplied could it be mandatory that these are water-efficient (washing machines and dishwashers), alongside energy-efficient?	This wording change has not been made. We did not consider this change to be appropriate as Policy CE1 sets consumption target of 105 litres or less per head per day for residential development.
Reg18-E-145	Environment Agency	Reg18-E-145/124	Climate Emergency	CE1 Environmental design and delivery						We strongly support all requirements under Policy CE1 and are pleased to see that the implementation section for CE1.1 recognises the need to ensure new developments are built to be resilient to future changes in climate	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/125	Climate Emergency	CE1 Environmental design and delivery						It is also positive to see reference to site specific Flood Risk Assessments taking climate change into account, in line with NPPF paragraph 161.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/126	Climate Emergency	CE1 Environmental design and delivery						Please note, a correction is required in implementation section CE1.1., where the first paragraph 'Development should demonstrate consideration of the climate emergency...' is repeated, first on the bottom right corner of page 233 and again at the top of the table on page 234.	This was an error and has now been corrected. Please see the new wording in Implementation CE1.1.
Reg18-E-145	Environment Agency	Reg18-E-145/127	Climate Emergency	CE1 Environmental design and delivery			CE1.3			In reference to policy requirement CE1.3., we are pleased to see the obligation for development to remediate contaminated land.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/128	Climate Emergency	CE1 Environmental design and delivery			CE1.3	3.199		In reference to paragraph 3.199, we note the acknowledgement that 'Historically, Newham's environment has been polluted by heavy industry, leading to contaminated land and groundwater across the borough' and the legacy of	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										historical industrial use remains' (page 232).	
Reg18-E-145	Environment Agency	Reg18-E-145/129	Climate Emergency	CE1 Environmental design and delivery			CE1.3	3.204		Again, justification paragraph 3.204 for Policy CE1 states that heavy industry 'has left Newham with a legacy of land and water pollution. Most of this affected land, and associated groundwater, is located adjacent to the Lower Lea Valley and south of the A13 in the Royal Docks and Beckton' (page 233).	Comment noted.
Reg18-E-145	Environment Agency	Reg18-E-145/130	Climate Emergency	CE1 Environmental design and delivery			CE1.3			Despite these identified constraints, the Local Plan lacks a strong requirement to manage risks of groundwater pollution. We argue that there is a clear need for groundwater protection, and not just the remediation of land. We strongly advise that consideration is given to whether a separate policy is needed for contaminated land and groundwater protection. We believe Newham would benefit from a policy requiring developers to demonstrate that the risks of pollution from contaminated land to groundwater are acceptable and can be appropriately managed.	This wording change has been made. Please see the new wording in Policy CE1.3
Reg18-E-145	Environment Agency	Reg18-E-145/131	Climate Emergency	CE1 Environmental design and delivery			CE1.3		CE1.3	We support the requirements under implementation section CE1.3.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/132	Climate Emergency	CE1 Environmental design and delivery			CE1.3		CE1.3	It should be clarified here that the risks associated with contaminated land extend beyond environmental health and include the protection of controlled waters which falls under the Environment Agency's remit.	This wording change has been made. Please see the new wording in CE1.
Reg18-E-145	Environment Agency	Reg18-E-145/133	Climate Emergency	CE1 Environmental design and delivery			CE1.3			It is important to note that there is currently no mention of Source Protection Zones (SPZs) or aquifers in the Local Plan, and <u>this must be addressed</u> . Proposals for sites situated in a vulnerable groundwater area within SPZs or on an aquifer must be dealt with in a way that protects the underlying groundwater. This is especially important where the previous land use at the site suggests the potential presence of contamination, or if the proposed land use is potentially contaminative.	This wording change has been made. Please see the new wording in CE1.
Reg18-E-145	Environment Agency	Reg18-E-145/134	Climate Emergency	CE1 Environmental design and delivery			CE1.3		CE1.3	For sites where piled foundation works are proposed in a Source Protection Zone, a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are minimised. We recommend that this is incorporated into the implementation advice for CE1.3., as well as in the development principles for the relevant site allocations (see comments below under 'Neighbourhoods', page 15).	This wording change has been made. Please see the new wording in CE1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/135	Climate Emergency	CE1 Environmental design and delivery			CE1.3			It is important to clarify that site investigations and subsequent remediation should be undertaken by a competent person, in line with NPPF paragraph 183. A 'competent person' is defined in the NPPF as 'A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution and land instability, and membership of a relevant professional organisation'.	This wording change has been made. Please see the new wording in CE1.
Reg18-E-145	Environment Agency	Reg18-E-145/136	Climate Emergency	CE1 Environmental design and delivery			CE1.3			We are pleased to see reference is made to the Environment Agency's Approach to Groundwater Protection and Land Contamination Risk Management (LCRM).	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/137	Climate Emergency	CE1 Environmental design and delivery			CE1.3			Reference should also be made to The Environment Agency's Approach to Groundwater Protection, which should be considered with regard to development proposals that the Environment Agency would object to in principle (e.g. petrol filling stations and non-inert landfills within SPZ1).	This wording change has been made. Please see the new wording in CE1.
Reg18-E-145	Environment Agency	Reg18-E-145/138	Climate Emergency	CE1 Environmental design and delivery			CE1.3			It is noted that Newham's Contaminated Land Strategy 2003 is now 20 years old. We recommend that this evidence is reviewed to ensure it remains current considering the opportunities to address contamination strategically across development sites.	Comment noted. This evidence base has been updated.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/139	Climate Emergency	CE1 Environmental design and delivery			CE1.5			Since Newham is located in an area of serious water stress (as identified in our report Water stressed areas - final classification), we recommend that water resources are more clearly be identified in the Local Plan as a challenge and opportunity	This wording change has been made. Please see the new wording in CE1.
Reg18-E-145	Environment Agency	Reg18-E-145/140	Climate Emergency	CE1 Environmental design and delivery			CE1.6			We are pleased that a higher standard of a maximum of 105 litre per person per day has been applied in policy requirement CE1.5 and welcome the policy's requirement that the Water Efficiency Calculator should be used to measure the efficiency of new builds (Sanitation, hot water safety and water efficiency: Approved Document G - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> )).	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/141	Climate Emergency	CE1 Environmental design and delivery			CE1.7			We also recommend reference is made to the Water company drainage and wastewater management plans, which account for climate change, ensuring drainage infrastructure can cope with increased intensity of storms. The Environment Act 2021 made these plans statutory and collaborative, and they should be integrated into long-term planning documents.	This wording change has been made. Please see the new wording in CE1.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-012	Lidl	Reg18-E-012/006	Climate Emergency	CE1 Environmental design and delivery			C1.4			CE1 – Environmental design and delivery Within this policy, Newham requires development to help improve environmental degradation in the Borough. However, there is no information on the definition of environmental degradation, the areas impacted by this and mitigation protocol for developments. Developers and occupiers may not be aware of the designations in place and the Local Authority should make this information readily available to ensure sufficient delivery of mitigation. Additionally, mitigation should be linked to development and meet the tests of the National Planning Policy Framework regarding relevance and necessity, which is currently unclear based on current wording of policy.	Comment noted. The Contaminated Land Strategy as well as other available data on historical land uses allow developers to understand the quality of land, and if it needs to be remediated.  Policy CE1.4 gives examples of how environmental degradation could be improved.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/121	Climate Emergency	CE1 Environmental design and delivery			4			It would be helpful to add to this to include nature recovery, as a positive, not just preventing environmental degradation.	A wording change has not been made, as it is considered that nature recovery is better suited in the Green and Water Spaces policies.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-002	Resident	Reg18-E-002/005	Climate Emergency	CE1 Environmental design and delivery						<p>Insufficient resources are going towards global climate change crises. Inaction will be devastating.</p>	<p>Comment noted. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p>In December 2023, Newham Council became the first local authority in the country to launch a Climate Action Just Transition Plan. It provides a blueprint to address the unequal impacts of climate change on Newham’s residents who are disproportionality impacted by the climate emergency, but pay the highest costs for climate adaptation.</p> <p>Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-002	Resident	Reg18-E-002/022	Climate Emergency	CE1 Environmental design and delivery						<p>How much is the council taking note that we are in a climate emergency? Please, let's see more action on pollution of all types.</p>	<p>Comment noted. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p>In December 2023, Newham Council became the first local authority in the country to launch a Climate Action Just Transition Plan. It provides a blueprint to address the unequal impacts of climate change on Newham's residents who are disproportionality impacted by the climate emergency, but pay the highest costs for climate adaptation.</p> <p>Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-025	Resident	Reg18-T-025/020	Climate Emergency	CE1 Environmental design and delivery						[Add to it]	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-026	Resident	Reg18-T-026/021	Climate Emergency	CE1 Environmental design and delivery						[Add to it]	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-034	Resident	Reg18-T-034/048	Climate Emergency	CE1 Environmental design and delivery						[Add to it]	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-036	Resident	Reg18-T-036/005	Climate Emergency	CE1 Environmental design and delivery						[Keep it]	Support noted.
Reg18-T-038	Resident	Reg18-T-038/009	Climate Emergency	CE1 Environmental design and delivery						[Add to it]	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-045	Resident	Reg18-T-045/008	Climate Emergency	CE1 Environmental design and delivery						[Add to it]	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan. No changes/additions have been made.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-057	Resident	Reg18-T-057/039	Climate Emergency	CE1 Environmental design and delivery						[Add to it]	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-058	Resident	Reg18-T-058/035	Climate Emergency	CE1 Environmental design and delivery						[Add to it]	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-T-105	Resident	Reg18-T-105/025	Climate Emergency	CE1 Environmental design and delivery						[Keep it]	Support noted.
Reg18-T-109	Resident	Reg18-T-109/058	Climate Emergency	CE1 Environmental design and delivery						[Add to it]	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan. No changes/additions have been made.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/146	Climate Emergency	CE1 Environmental design and delivery						The Berkeley Group takes very seriously its role in helping to combat climate change recognising that development has the potential to address and improve key environmental issues such as air quality, ground contamination and levels of recycling. The Berkeley Group is keen to work with LBN to ensure they are supporting them in tackling climate change issues. The Berkeley Group therefore supports the principles outlined in Policy CE1 and in particular welcomes the reference to the need for	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										development to remediate contaminated land. All of the Berkeley Group's development sites in Newham represent a significant opportunity to help improve environmental degradation in the borough in particular through the remediation of these sites, the significant urban greening that is planned which has the potential to secure significant biodiversity net gain and improvements to air quality.	
Reg18-E-028	Thames Water	Reg18-E-028/035	Climate Emergency	CE1 Environmental design and delivery			5			Policy CE1 Part 5 in relation to water efficiency is supported in principle,	Support noted.
Reg18-E-028	Thames Water	Reg18-E-028/036	Climate Emergency	CE1 Environmental design and delivery			5			but needs to be strengthened to ensure the targets are met. The Environment Agency has designated the Thames Water region to be an area of "serious water stress" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term. Water conservation and climate change is a vitally important	Support noted. The Thames Water target is contained in CE1.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.	
Reg18-E-028	Thames Water	Reg18-E-028/037	Climate Emergency	CE1 Environmental design and delivery			5			Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: <a href="https://www.thameswater.co.uk/Be-water-smart">https://www.thameswater.co.uk/Be-water-smart</a>	Comment noted.
Reg18-E-028	Thames Water	Reg18-E-028/038	Climate Emergency	CE1 Environmental design and delivery			5			It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.	
Reg18-E-028	Thames Water	Reg18-E-028/039	Climate Emergency	CE1 Environmental design and delivery			5			<p>Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels. We therefore consider that text in line with the following should be included in the Local Plan:</p> <p><u>"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be</u></p>	This wording change has not been made. We did not consider this change to be appropriate as we will not be using BREEAM as a policy criteria, and the policy maintains water efficiency standards (105 litres per head per day requirement) as per the 2018 Local Plan and representations from Thames Water.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<p><u>expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."</u></p>	
Reg18-T-013	Woodland Trust	Reg18-T-013/015	Climate Emergency	CE1 Environmental design and delivery						[Keep it]	Support noted.
Reg18-E-050	Anchor	Reg18-E-050/030	Climate Emergency	CE2 Zero Carbon development						[Duplicate, for C2 These policies exceed the optional standards set out in building regulations and are therefore inconsistent with national policy; both the Written Material Statement of 2015 and Planning Practice Guidance confirm (as highlighted in the Worthing Local Plan Inspector's Report) that local energy performance standards can't be set above the equivalent for Code for Sustainable Homes Level 4.	This wording change has not been made. The Written Ministerial Statement of 2015 was superseded in December 2023, and we do not consider that changes the ability for councils to set their own standards. Both the Climate Change Evidence Base and the Viability assessment indicate how the policy is achievable, deliverable and viable.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										As demonstrated by the Viability Assessment, these requirements will also significantly increase development costs (through higher build costs and commuted sums) which will impact on development viability and housing delivery. The policies are therefore not effective.]	
Reg18-E-122	Ballymore	Reg18-E-122/015	Climate Emergency	CE2 Zero Carbon development						[Appendix 1] The intent and ambition of the policy to push energy efficiency is buildings is supported.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-122	Ballymore	Reg18-E-122/016	Climate Emergency	CE2 Zero Carbon development			CE2.5			<p>[Appendix 1] However, the requirements set out in Part 5 relating to renewable energy generation on-site are challenging to achieve on most sites, given the performance of current technology, limitations of roof space and overshadowing.</p> <p>Consequently, most developments would be required to pay an off-set contribution in addition to other Section 106 planning obligations and Community Infrastructure Levy payments.</p> <p>Whilst supportive of the policy intent, Ballymore recommend refinement to Part 5 of the policy to allow its application more flexibly and to consider the wider viability implications of deliverability of much needed housing.</p>	<p>A wording change has not been made, as the target for renewable energy generation is an intrinsic part of the policy as a whole as set out in the Climate Change Evidence Base. The evidence base also outlines that that roof space should be prioritised for solar photovoltaic panels.</p> <p>The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.</p> <p>The evidence base also indicates that the policy is achievable and viable.</p>
Reg18-E-077	Ballymore Group	Reg18-E-077/042	Climate Emergency	CE2 Zero Carbon development						Ballymore supports the Council's ambitions for developments to be net zero carbon, [...]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/043	Climate Emergency	CE2 Zero Carbon development			EC2.1			however the current policy wording is too restrictive and could prevent the viable delivery of schemes. Part 1 of the policy should be amended to require developments to demonstrate they have minimised operational carbon emissions, with an overall aim of net zero carbon in operation, rather than a strict requirement for all developments to be operationally net zero carbon. While Ballymore strives to maximise sustainability and minimise carbon emissions across all their developments, it is very challenging (and expensive) to meet net zero carbon and there therefore must be a balance with achieving net zero carbon and other development costs and obligations (such as the delivery of affordable housing).	This wording change has not been made. We did not consider this change to be appropriate in light of our Climate Emergency commitments. The Climate Change Evidence Base outlines how net zero carbon is deliverable and viable.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/044	Climate Emergency	CE2 Zero Carbon development						We also consider the inclusion of defined energy standards (such as space heating demand and Energy Use Intensity) to be too prescriptive and should be amended to refer to relevant guidance or British Standards. The current drafting doesn't allow the policy to be updated or reflect changes in environmental standards and targets throughout the plan period.	This wording change has not been made. We did not consider this change to be necessary, as our evidence base demonstrates that the use of energy standards is a better approach than a percentage improvement over Building Regulations or other approaches. The use of consistent standards allows for certainty over the plan period, as well as mitigates any changes to external standards. Our policy supports the delivery of our Climate Emergency commitments, as well as national and regional climate goals.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/045	Climate Emergency	CE2 Zero Carbon development						<p>Further, we consider the targets themselves would be very difficult to achieve in practice based on Ballymore's extensive experience in delivering high performing, sustainable developments. In regard to the proposed renewables target, a significant proportion of the roof space would need to be given over to the provision of PVs to meet the identified targets, assuming an average output and not accounting for any shading / orientation issues etc which may reduce the efficiency of the PV array. This requirement doesn't account for other competing demands for roof space within a development, including plant, amenity space for residents and urban greening.</p>	<p>The policy approach has not been changed, as the Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. Improvements to biodiversity should be directed elsewhere (such as ground level landscaping).</p> <p>The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/046	Climate Emergency	CE2 Zero Carbon development						As currently drafted, we consider the draft policy to set unrealistic and potentially unachievable targets which may overburden developments and impact the delivery of other key planning considerations (such as amenity space and urban greening) within schemes. As such, we suggest that the draft policy should be less prescriptive in defining standards and targets, and should instead allow developments to demonstrate they have sought to maximise sustainability on site given site specific constraints and other competing planning requirements.	The policy approach has not been changed, as the Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. Improvements to biodiversity should be directed elsewhere (such as ground level landscaping).  The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.
Reg18-E-077	Ballymore Group	Reg18-E-077/047	Climate Emergency	CE2 Zero Carbon development						We would welcome the opportunity to meet with you and our specialist consultants to express our concerns and discuss the draft policy in further detail.	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/093	Climate Emergency	CE2 Zero Carbon development						P.236: CE2: Zero Carbon development - 1. 'All new buildings should be designed and constructed to be NetZero Carbon in operation.' Comment: With global construction accounting for nearly 40% of all CO2 emissions can planning permission being given be contingent on using certain alternative types of building materials which have far lower	Comment noted. Policy CE3 Embodied Carbon ensures that embodied carbon is considered as early as possible in the design process, and that major developments have embodied carbon limits.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										embodied, operational, and end-of-life carbon footprints than their more widely used industry counterparts? <a href="https://www.canadianarchitect.com/em-bodied-carbon-key-considerations-for-key-materials/">https://www.canadianarchitect.com/em-bodied-carbon-key-considerations-for-key-materials/</a>	
Reg18-E-133	Climate You Change	Reg18-E-133/094	Climate Emergency	CE2 Zero Carbon development						To receive planning permission could developers not only be asked to demonstrate the full cradle-to-grave low carbon footprint of their proposed construction materials and methods, but also be provided with certain options such as Hempcrete (hemplime) as a sustainable alternative construction and insulation material:	The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.
Reg18-E-133	Climate You Change	Reg18-E-133/095	Climate Emergency	CE2 Zero Carbon development						'Just Biofiber' have load bearing, structural, insulating Hempcrete blocks, doubling as wall and insulation. They use simple, affordable construction methods, saving on construction costs. Hempcrete controls humidity, reduces energy consumption and apparently sequesters carbon over its lifetime. (The latter would need to be verified.) They cut down on otherwise considerable quantities of concrete being used in buildings, effecting huge reductions in greenhouse gas emissions. (Concrete is listed as the World's third highest CO2 emitting sector. BBC News – 'Cement is the source of about 8% of the world's	The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										carbon dioxide (CO2) emissions, according to think tank Chatham House.')	
Reg18-E-133	Climate You Change	Reg18-E-133/096	Climate Emergency	CE2 Zero Carbon development						We understand that materials such as Just Biofiber load-bearing, insulating construction blocks would only be able to be used over the ten year period of Newham's Local Plan subject to the system being proven and receiving the necessary certification within the UK during this time. We are also aware that there we need to be a determination made with regard to who would be responsible for the maintenance of a newer material prior to seeking planning approval.	The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.
Reg18-E-133	Climate You Change	Reg18-E-133/097	Climate Emergency	CE2 Zero Carbon development						We also suggest that there be legislation to cover types of insulation. Could developers be stopped from using blown insulation if it contains HFCs, given their planetary warming capacity which is 1,000 times greater than CO2?	The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/098	Climate Emergency	CE2 Zero Carbon development						Could developers be required to show that they are using insulation such as denim insulation (with much better R-values than fiberglass) or Hempcrete owing to their low embodied carbon footprint? <a href="https://buildgreennh.com/denim-insulation/">https://buildgreennh.com/denim-insulation/</a>	The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.
Reg18-E-133	Climate You Change	Reg18-E-133/099	Climate Emergency	CE2 Zero Carbon development						Could it be mandatory for developers to be required through the planning process to lower their greenhouse gas emissions in all of their materials, such as steel made from almost 100% recycled content, using UK based electric arc furnaces, and windows chosen with respect to the best cradle-to-grave emissions.	The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.
Reg18-E-133	Climate You Change	Reg18-E-133/100	Climate Emergency	CE2 Zero Carbon development						(Triple glazed is not necessarily the best and consideration needs paying to the gas between the window panes, the frame material and how deep the window sits in the wall). <a href="https://www.building.co.uk/focus/choosing-low-carbon-windows/5060079.article">https://www.building.co.uk/focus/choosing-low-carbon-windows/5060079.article</a>	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/101	Climate Emergency	CE2 Zero Carbon development						Certain more sustainable materials will clearly increase construction costs and decrease the developer's profit.	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/102	Climate Emergency	CE2 Zero Carbon development						However, we know that the cost to everyone (including and beyond that which is just financial) is going to ultimately be far greater if we can't demand greater sustainability from industry whilst the choices made still	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										have time to avert unstoppable future climate change	
Reg18-E-133	Climate You Change	Reg18-E-133/103	Climate Emergency	CE2 Zero Carbon development						At the very least we would suggest a planning permission requirement to use a more effective insulating medium with a very high R value, provider the embodied carbon is not too high. This would though be far less attractive than creating requirements to use recycled material/natural material with a low carbon footprint which sequesters carbon.	The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/104	Climate Emergency	CE2 Zero Carbon development						We wish to ask how 'Net Zero Carbon in operation' can be accounted for with material and construction method choices, as part of developers seeking planning permission?	Comment noted. Policy CE2 addresses operational carbon, by ensuring new buildings are net zero carbon in operation by using ultra low amounts of energy to heat and run, using renewable energy. Where possible, they will generate sufficient on-site renewable energy to meet operational annual net zero, otherwise paying a renewable energy offset. This does not mean that the building is net zero in construction - the embodied carbon policies (Policies CE3) address the greenhouse gas emissions associated with the manufacture, transport, construction, repair, maintenance, replacement, and deconstruction of all building elements.
Reg18-E-133	Climate You Change	Reg18-E-133/105	Climate Emergency	CE2 Zero Carbon development					3.214	P.237 Justification 3.214 - Comment: We suggest that it is mandatory for developers to only use solar panels from suppliers where it can be proven that their PVs use the best technology, build quality and materials to have a long-life span. This would be provided that the embodied carbon (manufacturing and materials) does not negate the CO2 savings, achieved through greater product duration. (Germany has a good reputation for durable solar panels.)	This wording change has not been made. We did not consider this change to be appropriate, as the Local Plan cannot mandate suppliers for developers to use. However, the policy has changed to make clear that high performance solar PV panels should be used. Please see the new wording in CE2.5.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/106	Climate Emergency	CE2 Zero Carbon development					3.21 4	We suggest that there it is mandatory for developers to use saltwater batteries with solar panel systems. Despite requiring more space, these have a much lower carbon footprint and environmental impact than the mining of lithium for lithium-ion batteries. Saltwater batteries have about 3,000 charges, against lithium-ion which have about 500 charges! (Saltwater batteries are purported to be capable of having their lifespan extended through cleaning them with Epsom salts.)	This wording change has not been made. We did not consider this change to be appropriate, as we do not have evidence to support the use of specific types of batteries alongside solar PV systems.
Reg18-E-133	Climate You Change	Reg18-E-133/107	Climate Emergency	CE2 Zero Carbon development					3.21 7	P.238 CE2 - 3.217: 'It requires major development to report on energy performance for at least five years following completion' Comment: As an extra measure against the 'performance gap'...If developers fall short of their targets on predicted energy use and renewable energy generation, that they commit to over the five year monitoring period, as part of applying for planning consent from Newham Council...then we would like to suggest that they should be liable to fines each year accordingly (suitably sized to adequately discourage 'inflated' and 'unrealistic/unachievable' targets, through the means proposed at the planning stage).	This wording change has not been made. We did not consider this change to be necessary, due to careful monitoring of energy statements submitted at application stage and ensuring compliance with the standards post approval.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/108	Climate Emergency	CE2 Zero Carbon development					CE2.3	P.239 Implementation CE2.3: Could it be mandatory for developers to include a mechanical ventilation with heat recovery system (MVHR) within their buildings?	This wording change has not been made. We did not consider this change to be necessary, as meeting ventilation requirements is covered under building regulations. Developers have a range of options to meet these ventilation requirements, including MVHR.
Reg18-E-133	Climate You Change	Reg18-E-133/109	Climate Emergency	CE2 Zero Carbon development					CE2.3	Could heat pumps be mandatory?	This wording change has not been made. We did not consider this change to be appropriate as heat pumps may not always be the most appropriate heating system for a development.
Reg18-E-133	Climate You Change	Reg18-E-133/110	Climate Emergency	CE2 Zero Carbon development					CE2.3	Could solar panel systems be mandatory?	This wording change has not been made. We did not consider this change to be appropriate, as the policy and Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/111	Climate Emergency	CE2 Zero Carbon development					CE2.5	P.240 CE2.5: 'This offset payment would cover the purchasing and installation of a PV renewable energy system elsewhere in the borough' Comment: Could this offset payment alternative additionally include the option of using and/or a heat pump, and/or a mechanical heat extraction system (HVAC system), dependant on the practical and safe application of these different options?	Comment noted. The Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. It is not yet been determined how the solar PV offset fund will work in practice.
Reg18-E-133	Climate You Change	Reg18-E-133/112	Climate Emergency	CE2 Zero Carbon development					CE2.5	This could allow more roof space to be used for green roofing (dependant on weight tolerance and safe access of rooves for maintenance).	<p>Comment noted. The Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. Improvements to biodiversity should be directed elsewhere (such as ground level landscaping).</p> <p>The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/113	Climate Emergency	CE2 Zero Carbon development					CE2.5	Could another option be added to the quoted section above: Could the offset payment also be alternatively used to cover the cost of insulation of buildings elsewhere in the borough?	Comment noted. The Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. It is not yet been determined how the solar PV offset fund will work in practice.
Reg18-E-133	Climate You Change	Reg18-E-133/114	Climate Emergency	CE2 Zero Carbon development					CE2.5	In fact, if there is not enough provision for insulation grants for residents needing financial assistance to insulate their homes, sufficient funds for schools and/or if Newham Council do not have sufficient funds to insulate all their buildings, including council houses/flats, then we would suggest that Newham's Local Plan uses the above-mentioned offset payment to first ensure adequate insulation in Newham's buildings.	Comment noted. It is not yet been determined how the solar PV offset fund will work in practice. Newham is requesting funding from central government to help landlords, homeowners, housing associations and the Council's housing team to retrofit properties in Newham – to alleviate fuel poverty and the climate crisis.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/115	Climate Emergency	CE2 Zero Carbon development					CE2.5	Any green energy initiatives could otherwise only make a small dent in reducing the carbon footprint of the borough's energy needs if adequate insulation is not prioritised across the borough, in our opinion.	<p>Comment noted. Many homes across Newham are 'lovely but leaky' Victorian and Edwardian period homes. Newham is requesting funding from central government to help landlords, homeowners, housing associations and the Council's housing team to retrofit properties in Newham – to alleviate fuel poverty and the climate crisis.</p> <p>The Local Plan supports retrofit works to properties – noting that various retrofit works on houses can be undertaken without planning permission.</p>
Reg18-E-133	Climate You Change	Reg18-E-133/116	Climate Emergency	CE2 Zero Carbon development					CE2.5	P.240 CE2.5: • 'The proposed building must not use fossil-fuels on site.' Comment: Can the granting of planning permission be contingent on the developers signing up to use a 'green' energy provider, where there would otherwise be insufficient on-site sustainable energy production to meet the needs of the residents?	This wording change has not been made. We did not consider this change to be appropriate as the Local Plan cannot control what energy provider the developers or occupiers choose to use.
Reg18-Ae-001	East Ham Assembly	Reg18-Ae-001/168	Climate Emergency	CE2 Zero Carbon development						New housing - Clear policies on net zero in all new homes	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/021	Climate Emergency	CE2 Zero Carbon development						<p>The onerous requirements of draft policies relating to energy and sustainability in the context of data centre development</p> <p>The Climate Emergency chapter of the draft Plan includes a range of proposed policies regarding energy and sustainability. GLP are committed to delivering a data centre development of highest level of sustainability,</p>	Comment noted.
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/022	Climate Emergency	CE2 Zero Carbon development						<p>however there are inherent constraints around what this form of development can achieve compared to other industrial uses. We provide more detailed commentary below.</p> <p>Draft Policy CE2 (Zero Carbon development) includes a proposed requirement at part 4b(iv) that the Energy Use Intensity (EUI) of warehouse/industrial uses that are in operation 24 hours a day, such as data centres, is no more than 120kWh/m<sup>2</sup> GIA/year. GLP's sustainability advisors, Cundall, advise that this will be challenging to achieve for data centre development given the nature of the industrial process carried out and the extensive use of plant. The proposed requirement under part 5a(ii) for renewable energy generation of at least 120 kWh/m<sup>2</sup> per building footprint per annum would also be extremely</p>	<p>A wording change has been made - where a non-domestic development does not have an applicable category of use outlined in the policy (e.g. data centres), the development should discuss with the Council what the EUI target should be. In all cases, the development should demonstrate efficiency, with a building that uses as little energy as possible.</p> <p>The renewable energy generation requirement is an intrinsic part of the policy, as set out in the Climate Change Evidence Base (2022).</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<p>challenging given the extent of roofspace required for cooling plant, which reduces the potential for photovoltaics.</p> <p>Recommendation 3: Amend draft Policy CE2 to reflect the specific challenges of achieving the EUI and renewable energy generation requirements for data centre development.</p>	
Reg18-E-093	Greater London Authority	Reg18-E-093/014	Climate Emergency	CE2 Zero Carbon development						<p>The draft plan policy requires all new buildings to be designed and constructed to be Net Zero Carbon in operation with no fossil fuels used for heat or energy. In this regard, the draft policy sets out Energy Use Intensity (EUI) targets for individual uses which are broadly similar to the benchmark figures in the latest update to the Energy Assessment Guidance. While having EUI targets as policy requirements is not in itself an issue, the borough might want to evaluate the implications in practice in terms of implementation, resources and other requirements on applicants.</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/015	Climate Emergency	CE2 Zero Carbon development						<p>While being largely supportive of Newham taking these progressive policies forward, including the requirement for Whole Life Carbon assessments for all major developments, the Mayor does have some key concerns regarding draft policy CE2 Zero Carbon development. London Plan Policy SI 3 Energy Infrastructure is clear on the importance of heat networks as part of London's trajectory to meet net zero carbon targets. Under Newham's proposed policies buildings can connect to heat networks that are already decarbonised. However, this presents an issue in the medium term for connection to existing heat networks which are normally gas-based. London Plan policy supports connection to these networks where there are decarbonisation plans in place which would not be possible under Newham's proposed policy approach. There is no explicit support for District Heat Networks to expand and decarbonise. While draft Policy W4.5 encourages applicants to identify opportunities to connect to existing and future planned heat networks, this policy focus on individual zero carbon systems may have a negative impact on the proposed District Heat Network (DHN) in Royal Docks (city airport) and the proposed extension of Olympic DHN.</p>	<p>The policy approach has changed to clarify the timeframe regarding decarbonisation of existing fossil fuel powered heat networks. Please see the new wording in Policy CE2.2. The policy strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/016	Climate Emergency	CE2 Zero Carbon development						<p>The draft policy CE2 supports individual electric heating system solutions which could be limited by local grid infrastructure and do not provide flexibility for peak demand management. Direct electric heating solutions do not provide on-site carbon savings in line with the energy hierarchy of London Plan Policy SI 2A and are likely to result in higher energy costs for the occupants. The individual systems may also have cumulative impacts for embodied carbon as individual systems often do not perform as designed (AECOM Building 2050 study). Therefore, the Mayor recommends that direct electric solutions should only be acceptable if quality assurance mechanisms are in place to ensure that there are no performance gaps.</p>	<p>A change to this policy approach has not been made. The use of assured performance methods (such as Passivhaus) will ensure that performance gaps are minimised. The Climate Change Evidence Base indicates that direct electric may become more viable over time due to significant reduction in energy demand compared to standard new build homes.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/017	Climate Emergency	CE2 Zero Carbon development				3.215		<p>The draft policy CE2 (Planning Obligations and paragraph 3.215) requires carbon offsetting to pay for renewable energy (solar PV) rather than implementing broader carbon reduction as set out in the London Plan Policy SI2 D. This may further increase costs for implementing communal heating systems and not necessarily achieve net zero for major developments. The proposed carbon offset fund linked to solar PV should reconsider assumptions on availability of roof space for PV and consideration of other policies.</p>	<p>A change to this policy approach has not been made. The Climate Change Evidence Base outlines the approach of using solar PV offsetting, as well as considering available roof space and other policy impacts (amenity, biodiversity). Recent evidence base from other London boroughs also shows the potential of this approach, and the benefits compared to a carbon offset price.</p> <p>The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.</p>
Reg18-E-093	Greater London Authority	Reg18-E-093/018	Climate Emergency	CE2 Zero Carbon development						<p>The Mayor notes that the requirement for multiple energy assessments may impose unnecessary burdens on the applicant and suggests the approach should recognise and estimate the resource implication of implementing the climate energy policies effectively. GLA officers are happy to support Newham to further develop their climate policies and</p>	<p>Comment noted. We consider that a scheme compliant with Newham's policy would meet the strategic objectives of the London Plan policies - namely, being net zero buildings. We are working with other London boroughs to coordinate a similar approach to help reduce regulatory burden.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										especially to align these policies with London Plan Policy SI3 in regards to importance of strategic heat networks and following the energy hierarchy as per Policy SI2.	
Reg18-E-130	Hadley Property Group	Reg18-E-130/146	Climate Emergency	CE2 Zero Carbon development						Hadley supports the vision to reduce emissions in the whole life cycle of a building and for the principle of net zero design and construction	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/147	Climate Emergency	CE2 Zero Carbon development						However, the policy imposes very onerous requirements, such as that no new developments should be connected to the gas grid.	Comment noted. Alternatives to fossil fuel powered heating (such as heat pumps) are viable and affordable, and are being used in a wide range of developments across London.
Reg18-E-130	Hadley Property Group	Reg18-E-130/148	Climate Emergency	CE2 Zero Carbon development						Hadley suggests that while a worthwhile goal to generate renewable energy on site, this may not be feasible in the short term and therefore suggest that Part 5 of the policy should be reworded to: "new developments <b>that have the capacity to</b> , should generate renewable energy on site and <b>should not be connected to the gas grid</b> ".	This wording change has not been made. We did not consider this change to be appropriate, as evidence shows that new buildings cannot continue to burn fossil fuels for heating if the London Borough of Newham is to stay within carbon budgets. The use of low carbon heat, and the generation of renewable energy on-site are intrinsic parts of the policy, as supported by the evidence base.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-105	IQL South	Reg18-E-105/032	Climate Emergency	CE2 Zero Carbon development						IQL South is supportive in principle to more pushing standards for more energy efficient and sustainable buildings to help address climate change.	Support noted.
Reg18-E-105	IQL South	Reg18-E-105/033	Climate Emergency	CE2 Zero Carbon development			CE2.3			The majority of development in Stratford City and other major developments include obligations to connect to the District Energy Networks (DEN). These are subject to decarbonising strategies over the medium term. Consequently, developments with this commitment to the DEN will not be able to meet all the requirements in Part 3 and therefore, the policy should reference and allow flexibility in these instances.	The policy approach has changed to clarify the timeframe regarding decarbonisation of existing fossil fuel powered heat networks. Please see the new wording in Policy CE2.2. The policy strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-105	IQL South	Reg18-E-105/034	Climate Emergency	CE2 Zero Carbon development			CE2.5			<p>The ability to achieve the requirement in Part 5 for buildings to generate the equivalent of their own energy through on site renewables, is mainly dependent on its roof size. As a result, buildings in more densely development urban locations will be less likely to be able to achieve the requirement, mostly due to site constraints.</p>	<p>A wording change has not been made, as the target for renewable energy generation is an intrinsic part of the policy as a whole as set out in the Climate Change Evidence Base. The evidence base modelled a variety of buildings to demonstrate that the policy can be complied with. Where it can be sufficiently evidenced that it is not technically possible for the amount of energy generated in a year through onsite renewable energy production to match or exceed the predicted annual energy demand of the building, the applicant should fund renewable energy generation elsewhere in the borough.</p> <p>The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.</p>
Reg18-E-105	IQL South	Reg18-E-105/035	Climate Emergency	CE2 Zero Carbon development			CE2.5			<p>Furthermore, if off-setting costs are applied these should be clearly set out and proposed at an affordable level.</p>	<p>Comment noted. The Climate Change Evidence Base shows how the offset cost has been calculated.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-105	IQL South	Reg18-E-105/036	Climate Emergency	CE2 Zero Carbon development			CE2.5			Accordingly, IQL South recommends that flexibility is applied to the policy so that it does not disproportionately affect high density schemes in accessible locations where roof space is limited for effective renewable energy provision. Additionally, any rate for off-setting costs should be set at an affordable level	The policy approach has not changed. The Climate Change Evidence Base sets out that high rise typologies would be unable to achieve a energy balance on site, but could achieve a 80kWh/m2 generation, complying with the policy. The evidence base also sets out the methodology behind the offsetting cost.
Reg18-E-126	IXDS Ltd	Reg18-E-126/013	Climate Emergency	CE2 Zero Carbon development						A key benefit of the data economy, and in particular, next-generation data centre developments, is the potential for the vast excess heat that they produce to be harnessed and fed into a wider heat network. The opportunity to incorporate these aims into the new Local Plan, exceeding the base requirements of the London Plan in this respect, should not be missed as this could further integrate Newham's corporate aims to become a leading borough in digital infrastructure innovation with Newham's declaration of a climate emergency.	This policy approach has now changed to make clear that waste heat can be a potential source of low carbon heat, noting considerations of the waste hierarchy (reducing the amount of waste produced), ensuring as little as energy is used and that air quality impacts are considered. Furthermore, waste heat would not be considered to be a benefit of a scheme unless it pays for the development of heat network infrastructure that would allow waste heat to be delivered. Please see the new wording in Implementation Policy CE2.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-126	IXDS Ltd	Reg18-E-126/017	Climate Emergency	CE2 Zero Carbon development						<ul style="list-style-type: none"> <li>Drawing from London Plan Policy SI 3, opportunities for the harnessing of excess heat from data centre developments to benefit local neighbourhoods should be realised. This should be achieved by incorporating policies that promote the delivery of district heat networks as part of data centre development. This aim should form a part of draft Policy CE2 (Zero Carbon Development) and (where relevant) the wider suite of draft Climate Emergency policies to ensure an overarching vision.</li> </ul>	This policy approach has now changed to make clear that the waste heat from data centres is considered to be a decarbonised heat source, and that data centres should be connected to a heat network so that the waste heat can be utilised. Please see the new wording in Policy CE2.
Reg18-E-096	L&Q	Reg18-E-096/024	Climate Emergency	CE2 Zero Carbon development						<p><u>Climate Emergency</u> LBN has set ambitious targets through their climate change policies. Whilst we are supportive of this, we are concerned that some of the policies set targets that have not been fully tested to ensure they are deliverable across a range of schemes (both in terms of type and sizes). This includes Policy CE2, which dictates that new developments should achieve an Energy Use Intensity of 33 KWh/m2 GIA/yr; [...] Further evidence is required to demonstrate whether these targets are deliverable.</p>	Comment noted. The Climate Change Evidence Base indicates the achievability and deliverability of the policy and the cost impacts of meeting those targets. These costings have been fed into the viability assessment.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/036	Climate Emergency	CE2 Zero Carbon development						Policy CE2, Zero Carbon Development. While the intention of the policy to advance the delivery of zero carbon development is supported there are aspects of the approach that are not consistent with the London Plan and the	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Mayor of London's subsequent guidance on reaching this goal.	
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/037	Climate Emergency	CE2 Zero Carbon development						Policy CE2, Zero Carbon Development. This in particular would have an adverse effect on plans to connect newdevelopment to the existing district energy network that serves the Queen ElizabethOlympic Park and Stratford City areas and has the potential to provide low carbon energy to a wider area in line with policy within the London Plan and the LLDC Local Plan. Some amendment to the current draft of the policy is considered to be necessary in order to avoid this unintended consequence.	The policy approach has changed to clarify the timeframe regarding decarbonisation of existing fossil fuel powered heat networks. Please see the new wording in Policy CE2.2. The policy strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/122	Climate Emergency	CE2 Zero Carbon development						Draft policy CE2 states that 'new development should not use fossil fuels for heat or energy.' This may prejudice the delivery of London Plan Policy SI3 D(1) which states that major development within Heat Network Priority Areas should, by preference, connect to existing or planned heating networks. At present, the QEOP/Stratford City district heating network is partially reliant on fossil fuels, with decarbonisation plans in development. By placing a blanket restriction on development using fossil fuels, the policy risks prejudicing the ongoing operation of district heating networks that are phasing out fossil fuels.	The policy approach has changed to clarify the timeframe regarding decarbonisation of existing fossil fuel powered heat networks. Please see the new wording in Policy CE2.2. The policy strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/123	Climate Emergency	CE2 Zero Carbon development						The GLA's Energy Assessment Guidance allows for future decarbonisation measures to be taken into account in assessing the carbon factors of development connecting to DHNs, as well as 'sleeving' (i.e. using a carbon factor associated with the low carbon heat source only, rather than the factor for the network as a whole). So that the heat network can effectively decarbonise and continue to serve new development, draft Policy CE2 should be amended to enable developments to connect to district heating networks where such an approach would be compliant with Building Regulations Part L, and where there is a decarbonisation plan in place.	The policy approach has changed to clarify the timeframe regarding decarbonisation of existing fossil fuel powered heat networks. Please see the new wording in Policy CE2.2. The policy strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/124	Climate Emergency	CE2 Zero Carbon development						In calculating a development's emissions, these decarbonisation measures should be taken into account, and 'sleeving' (i.e. using a carbon factor associated with the low carbon heat source only, rather than the factor for the network as a whole) should be allowed.	Comment noted. Although sleeving would be supported as an interim measure, this policy strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.
Reg18-E-027	Resident	Reg18-E-027/006	Climate Emergency	CE2 Zero Carbon development						Recommended new policy 4: Net zero carbon buildings – energy use intensity I am concerned here that the text suggests that nuclear energy has a role to play in net zero carbon buildings. Nuclear obviously brings many environmental problems, not least the problem of how to safely deal with nuclear waste. 'New nuclear' is a bit like 'clean coal' - nuclear is inherently unsafe. I'm not even sure if it is low carbon, if you take into account the need for perpetually ongoing mining and	A change to the policy approach has not been made. The Local Plan does not influence national policy regarding electricity generation - the Plan supports the use of renewables as part of the transition of the grid away from fossil fuels.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										transportation of nuclear materials. I'm assuming that Newham isn't however planning on building its own nuclear power station! If the mention of nuclear here refers to its possible use to power the national grid, that's even more of an incentive to have energy-efficient buildings and solar photovoltaics on the buildings, to avoid relying too heavily on the grid.	
Reg18-E-027	Resident	Reg18-E-027/008	Climate Emergency	CE2 Zero Carbon development						Climate change evidence base recommended policies, and Draft Local Plan Climate change policies Recommended policies 1, 3, and 5 and Draft local plan CE2 – The wording needs tightening up – the following terms are all too loose and open to manipulation and abuse by developers: 'renewable energy' 'low-carbon heat' 'low-carbon fuels', 'sustainable' 'on-site' 'the gas grid'. These terms are notoriously slippery. The LLDC and their current 'decarbonisation' plan propose the following as 'renewable', 'low-carbon' and 'sustainable': burning wood-chip, 'green gas', hydrogen, energy from the Edmonton incinerator. The problem is that 'renewable' and 'low-carbon' are not scientifically robust enough definitions; there are lots of developers	A change to this policy approach has not been made. We did not consider this change to be necessary or appropriate, in light of our Climate Change Evidence Base and definitions in the glossary section.



<p><b>Comment Response</b></p>	
<p><b>Comment</b></p>	<p>out there willing to take advantage of this. This is made more difficult by the fact that some governments and political institutions have also ignored scientists and defined burning wood as 'renewable energy' and defined 'heat from waste' as 'low-carbon'. Yet of course we know that burning wood releases huge amounts of carbon, as well as having many additional environmental problems, and we know the same for the incinerator at Edmonton.</p>
<p><b>Implementation</b></p>	
<p><b>Justification</b></p>	
<p><b>Clause</b></p>	
<p><b>Introduction</b></p>	
<p><b>Site allocation</b></p>	
<p><b>Policy</b></p>	
<p><b>Chapter</b></p>	
<p><b>Comment Reference</b></p>	
<p><b>Representor</b></p>	
<p><b>Representation Reference</b></p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/009	Climate Emergency	CE2 Zero Carbon development						<p>I also need to bring in here the issue of district heat networks – this is very important as they are likely to be used as ‘greenwash’ by developers and I believe there are district heat networks planned for Newham, in addition to the currently high-carbon district heat network in the Olympic Park. The evidence base briefly mentions the problems that can occur with district heat networks. I get the distinct impression that the authors of the report have been silenced from writing the true extent of their concerns. Levitt Bernstein has previously written an excellent detailed and very critical report of the LLDC’s District Heat Network in the Olympic Park; the report has been hidden and ignored. As far as I can see, the issue of district heat networks is not mentioned at all in the actual Draft Local plan climate emergency policies. This is extremely concerning, as it is likely to be one of the main ways that developers evade their climate emissions policies. This is what has happened with the LLDC. They have avoided putting heat pumps and photovoltaics on individual buildings by claiming it is better to connect them all to the district heat network, and with a vagueness as to whether ‘on-site’ can include the district heat network rather than individual buildings. Unfortunately there has been in London and maybe nationally an almost fetishizing of district</p>	<p>The policy approach has changed to clarify the timeframe regarding decarbonisation of existing fossil fuel powered heat networks. Please see the new wording in Policy CE2.2. The policy strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<p>heat networks, a claim that connecting to a district heat network is in itself of environmental benefit, without regard as to what is actually powering the district heat network. The current LLDC 'decarbonisation plan' for the district heat network proposes that hydrogen will be the way forward, and therefore it is fine to carry on connecting everything to the district heat network, which is currently gas. But of course we don't know if this hydrogen will ever come to fruition and if it will actually be low-carbon in its production. They can then also claim they haven't connected anything to 'the gas grid', whilst running their own mini-gas grid, where, although fossil fuel itself may not be burned at the district heating network, fossil fuels have been used to produce the hydrogen. I am really pleased to see that the issue of hydrogen has been addressed in CE2.3, but the vagueness of the other terms means the policy isn't robust enough. The complete silence on the problems of district heat networks in the Newham draft plan climate emergency policy is unacceptable.</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/011	Climate Emergency	CE2 Zero Carbon development			CE2.4/5			CE2.4 and CE2.5 Although these policies have taken on board some of the warnings in the evidence base, it does not look to me as though they have sufficient metric to measure whether or not a building is 'net-zero'. This adds to problems detailed above. Please see also my comments on the evidence base, which relate to who and how progress and compliance will be monitored.	A change to this policy approach has not been made. The use of assured performance methods (e.g. Passivhaus) will allow determination of the quality of a building to ensure it will be net zero.
Reg18-E-002	Resident	Reg18-E-002/027	Climate Emergency	CE2 Zero Carbon development						Renewables. Why isn't the council investing in solar for it's buildings , schools, colleges etc?. This sends out all the right signals to the private sector as well as to residents and home owners. Encourage housing associations to do likewise. There are schemes that pay for themselves (contact me if you want info on solar coops) over the lifespan of the solar installation, eventually allowing for free electricity to those schools etc.	The Local Plan addresses this topic through the Climate Emergency policies. All new buildings will have solar PVs to generate renewable energy. However it cannot deliver the change you request, as the delivery of such projects would be the responsibility of the landowners. Other teams across the Council – including the Housing, Climate Action and Education teams – are working to deliver renewable energy in Newham.
Reg18-T-031	Resident	Reg18-T-031/003	Climate Emergency	CE2 Zero Carbon development						The council of Newham should stand stronger against the selfish car-lobby who apparently don't understand the reason of the great measurements such as quieter neighborhoods and extention of ulez zones. Newham would not contribute to the national and international agreed requirements for a	Comment noted. The Climate Emergency and Transport policies consider and promote these, to improve Newham's environment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										safer and healthier environment and even more people will die.	
Reg18-T-114	Resident	Reg18-T-114/003	Climate Emergency	CE2 Zero Carbon development						[Add to it] Any above 32m tall building should have windows with solar panels built in (new tech) or facades with solar panels. Possible battery storage to minimise the use of electricity	Comment noted. The Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels.
Reg18-T-116	Resident	Reg18-T-116/011	Climate Emergency	CE2 Zero Carbon development						[Add to it] Maybe we should also try to educate residents more about the whys and the best practices with more and clear call to action signages everywhere and more information at schools and public places. Environmentally friendly behaviour should become the norm, something we do without thinking.	The Local Plan addresses this topic in the Climate Emergency policies. However it cannot deliver the change you have requested. Our colleagues in the Climate Action department are able to help. We have also provided them with your comments.
Reg18-T-116	Resident	Reg18-T-116/012	Climate Emergency	CE2 Zero Carbon development						[Add to it] Even at Morrisons we should see an area with greener products (eg recyclable) like we see areas with discounted products. Building managers, library workers, super market managers - everyone- should do their bit and be somehow motivated by the council to promote greener behaviours and raise awareness.	The Local Plan addresses this topic in the Climate Emergency policies. However it cannot deliver the change you have requested. Our colleagues in the Climate Action department are able to help. We have also provided them with your comments.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-092	Royal Docks	Reg18-E-092/026	Climate Emergency	CE2 Zero Carbon development						<p>Climate Emergency</p> <ul style="list-style-type: none"> <li>• CE2 – we suggest that specific reference should be made in this policy to encourage new and existing developments to connect to new or existing heat networks. The policy should also reference the need for all heat networks to move towards zero carbon fuels as soon as possible.</li> </ul>	<p>A wording change has not been made. Both the Climate Emergency and Utilities policies support connections to new or existing heat networks, albeit ones that are decarbonised. Policy CE2.2 strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.</p>
Reg18-E-116	SEGRO Plc	Reg18-E-116/049	Climate Emergency	CE2 Zero Carbon development						<p>One of the three long-term priorities in SEGRO's 'Responsible SEGRO' framework is to champion low-carbon growth. SERGO aims to reduce carbon emissions from its development activity and the operation of its existing buildings, and eliminate them where possible, and is targeting becoming net-zero carbon by 2030. <u>SEGRO therefore supports the</u></p>	<p>Support noted.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<u>overarching policy aim to deliver carbon efficient development</u>	
Reg18-E-116	SEGRO Plc	Reg18-E-116/050	Climate Emergency	CE2 Zero Carbon development						Notwithstanding this, SEGRO has some concerns in respect of the draft Policy wording and how this would work in practice.	Comment noted.
Reg18-E-116	SEGRO Plc	Reg18-E-116/051	Climate Emergency	CE2 Zero Carbon development			1			Part 1 of the draft Policy states that all new buildings should be designed and constructed to be net zero carbon in operation. This aligns with London Plan Policy SI 2. Policy SI 2 also allows for instances where it can be clearly demonstrated that such a target cannot be met, with shortfalls to be provided via cash in lieu contribution towards a carbon offset fund or off-site via an alternative proposal. Draft Policy CE2 makes no such allowance. For some buildings/operations, net zero carbon may be technically infeasible, and the wider benefits of development should not be unduly restricted where the technical constraints can be clearly evidenced. <u>SEGRO therefore considers that part 1 should allow for carbon offsetting payments and off-site delivery where this can be clearly justified, in line with the London Plan.</u>	A wording change has not been made, as we are setting higher standards than the London Plan in light of our climate objectives. The Climate Change Evidence Base demonstrates that the policy is technically possible for a range of industrial buildings. The overall policy objective is that net zero buildings will use ultra-low amounts of energy, use low carbon heat, and contribute to the generation of renewable energy on-site.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/052	Climate Emergency	CE2 Zero Carbon development			2c			<p>The space heating demand rates set out in part 2(c) and the industrial energy requirements set out in parts 4(b(iv)) and 5(a)(ii) of the draft Policy could be an acceptable target if applied to a base build, single storey industrial unit. However, for an industrial building which has several mezzanines or floors which require heating, this may not be achievable. Multi-storey units also have additional operational requirements including requiring more roof light space and safe access areas. The draft Plan (and the London Plan) place a significant emphasis and encouragement on intensification of industrial uses in order to assist meeting demand. <u>Any relevant energy standards need to reflect this encouragement and acknowledge that more intensified industrial buildings will inherently generate a higher energy demand</u></p>	<p>A wording change has been made in the implementation section to make clear that a development should demonstrate efficiency, with a building that uses as little energy as possible. The EUI target should be discussed with the Council as soon as possible. Policy CE2 only applies to new residential, non-domestic and industrial buildings, with all other development is encouraged to use as little energy as possible.</p>



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/053	Climate Emergency	CE2 Zero Carbon development			3			Part 3 of the draft Policy states that new development should not use fossil fuels or heat or energy. This is not achievable. All developments will be connected to the wider electricity network and the majority of the electricity generated in the UK currently is derived from natural gas (c. 60%). SEGRO does not provide gas connections to any of its developments and endeavours to use the most efficient localised heat pump system available to provide space and water heating. However, there are still instances where systems will use fossil fuels – for example, an ASHP will still use fossil fuels when the PV panels are not generating. Whilst the target is to use renewable energy all the time, this cannot be guaranteed consistently. <u>Given that this target is unachievable and impractical, we suggest that part 3 is reviewed to ensure that the policy is reasonable and enforceable.</u>	A change to the policy approach has not been made, as it is considered that the policy is deliverable and enforceable. This has been tested in the Climate Change Evidence Base - Operational energy and carbon evidence base (2022).  The Implementation of the policy makes clear that development itself should not use fossil fuels in operation, noting that the electricity network will decarbonise over time.
Reg18-E-116	SEGRO Plc	Reg18-E-116/054	Climate Emergency	CE2 Zero Carbon development			6b			SEGRO monitors energy use and renewable energy generation as part of BREEAM monitoring and to report to shareholders and investors. Therefore, SEGRO accepts the monitoring targets set out in part 6(b) of the draft Policy.	Support noted.
Reg18-E-116	SEGRO Plc	Reg18-E-116/055	Climate Emergency	CE2 Zero Carbon development			6			SEGRO understands part 6 to be a reporting tool only and would object to a policy that sought some kind of penalty or compensation during the course of	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										the building's operation, as this is outside of the landlord's control.	
Reg18-E-116	SEGRO Plc	Reg18-E-116/056	Climate Emergency	CE2 Zero Carbon development			5			However, <u>SEGRO strongly objects to part 5(b) of the draft Policy which would appear to place an unreasonably onerous burden on development which could threaten lettings and discourage investment (and therefore job creation) in the borough.</u> As drafted, part 5 states that new development should generate all of its renewable energy on site to a level equivalent to, or in excess of, the predicted annual energy demand of the building. Where this is not possible it may be subject to a payment-in-lieu contribution. It is not clear how this payment would be calculated and whether it would be a one-off payment or an annual payment in perpetuity, or whether this would be time limited to five years post operation in line with part 6(b).	A change to the policy approach has not been made, as the Climate Change Evidence Base - Operational energy and carbon evidence base (2022) outlines how the offset payment to fund renewable energy generation in the borough is to be calculated and paid as a one-off. Please see Implementation CE2.4
Reg18-E-116	SEGRO Plc	Reg18-E-116/057	Climate Emergency	CE2 Zero Carbon development			5			The Policy lacks clarity in this respect and raises a number of issues:	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/058	Climate Emergency	CE2 Zero Carbon development			5			First, as set out above, despite best endeavours, it is not always possible for all energy to be generated via renewables. Linking back to the comments on part 1, there has to be an acknowledgement that the net zero target will not always be achievable and in these instances this policy would place a significant additional burden which would already have been accounted for in any carbon offset payment / off-site delivery. This is unreasonable.	A change to the policy approach has not been made. The Implementation of the policy makes clear that development itself should not use fossil fuels in operation, noting that the electricity network will decarbonise over time.
Reg18-E-116	SEGRO Plc	Reg18-E-116/059	Climate Emergency	CE2 Zero Carbon development			5			Second, commercially this would be very challenging and could discourage investment. For speculative development the exact energy demand may be difficult to predict, and this would cause uncertainty in assessing the scale of the payment or if a payment was due at all. In addition, a building may be occupied by different tenants over its lifetime with different operational equipment and therefore different energy needs. Some may operate within the on-site renewable energy level and some may not.	Comment noted. The use of PHPP to predict the energy demand of a building is an established method, and is recommended in the policy.
Reg18-E-116	SEGRO Plc	Reg18-E-116/060d	Climate Emergency	CE2 Zero Carbon development			5			For the reasons set out above, <u>SEGRO considers that part 5 of the draft Policy, particularly 5(b) is unreasonable, lacks clarity and could deter investment. Therefore, it is strongly suggested that this element of the draft Policy be removed.</u>	A change to the policy approach has not been made, as the Climate Change Evidence Base - Operational energy and carbon evidence base (2022) demonstrates how the policy can be delivered.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/028	Climate Emergency	CE2 Zero Carbon development			2		<p>CE2: Zero Carbon Development – Clarification</p> <p>Section 2. of draft new policy CE2 introduces a series of heat demand targets for different building types. This requirement did not exist in previous policy, so the approved scheme has not been assessed against these metrics, meaning it is not possible to confirm whether compliance is already achieved or not. As the new heat demand targets represent best practice in the industry, it is anticipated that the current building fabric design would not provide compliance with the targets.</p> <p>Recommendation</p> <p>SHL suggests that:</p> <ul style="list-style-type: none"> <li>• LBN clarifies in the supporting text relating to policy that the policy requirements only relate to the determination of planning applications moving forwards and that the policy requirements will not be retrospectively applied to consented / legacy schemes (or flexibility given at the very least).</li> </ul>	<p>Comment noted. Planning applications are determined against the current Development Plan. Reserved matters and other changes to developments would be considered against the outline planning permission, any new policies can only over-ride on matters which have not already been established in principle by the outline permission.</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/029	Climate Emergency	CE2 Zero Carbon development			3			Current LBN policy SC2 – Energy & Zero Carbon requires the application of the heating hierarchy stipulated by the London Plan but does not explicitly specify what type of heating systems can or can't be used for space heating and hot water generation, meaning on-site gas-fired boiler plant is acceptable provided the carbon reduction (35% vs. gas boiler baseline) target is achieved. This is in conflict with the position of section 3 of the draft new policy CE2 which states "New development should not use fossil fuels for heat or energy" as combustion plant is not compatible with the with Net Zero Carbon buildings as the carbon emissions they produce will not reduce over time and will eventually need to be removed and replaced with a low carbon heating system.	Comment noted. The Climate Change Evidence Base sets out the methodology and rationale behind the Climate Emergency policies, including that fossil fuels should not be used for heat or energy on site.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/030	Climate Emergency	CE2 Zero Carbon development			3			<p>The proposed system for the approved scheme currently includes on-site gas-fired boiler plant and connection to a gas CHP and boiler heat network. This is a compliant solution for the 2018 Local Plan policy but would not be acceptable for the 2022 Local Plan policy.</p> <p>Recommendation</p> <p>SHL suggests that:</p> <ul style="list-style-type: none"> <li>LBN clarifies in the supporting text relating to policy that the policy requirements only relate to the determination of planning applications moving forwards and that the policy requirements will not be retrospectively applied to consented / legacy schemes (or flexibility given at the very least).</li> </ul>	<p>Comment noted. Planning applications are determined against the current Development Plan. Reserved matters and other changes to developments would be considered against the outline planning permission, any new policies can only over-ride on matters which have not already been established in principle by the outline permission.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/031	Climate Emergency	CE2 Zero Carbon development			4		<p>Section 4. of draft new policy CE2 introduces a series of energy use intensity (EUI) targets for different building types. This requirement did not exist in previous policy, so the approved scheme has not been assessed against these metrics, meaning it is not possible to confirm whether compliance is already achieved or not. As the new EUI targets represent best practice in the industry, it is anticipated that the current building fabric and systems design would not provide compliance with the target.</p> <p>Recommendation</p> <p>SHL suggests that:</p> <ul style="list-style-type: none"> <li>• LBN clarifies in the supporting text relating to policy that the policy requirements only relate to the determination of planning applications moving forwards and that the policy requirements will not be retrospectively applied to consented / legacy schemes (or flexibility given at the very least).</li> </ul>	<p>Comment noted. Planning applications are determined against the current Development Plan. Reserved matters and other changes to developments would be considered against the outline planning permission, any new policies can only over-ride on matters which have not already been established in principle by the outline permission.</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/032	Climate Emergency	CE2 Zero Carbon development			5		<p>Section 5. of draft new policy CE2 introduces new renewable energy generation targets for different building types. This requirement did not exist in previous policy, so the approved scheme has not been assessed against these metrics, meaning it is not possible to confirm whether compliance is already achieved or not. As the new renewable energy generation targets represent best practice in the industry, it is anticipated that the current renewable energy generation provision would not provide compliance with the target.</p> <p>Recommendation</p> <p>SHL suggests that:</p> <ul style="list-style-type: none"> <li>• LBN clarifies in the supporting text relating to policy explains that the policy requirements only relate to the determination of planning applications moving forwards and that the policy requirements will not be retrospectively applied to consented / legacy schemes (or flexibility given at the very least).</li> </ul>	<p>Comment noted. Planning applications are determined against the current Development Plan. Reserved matters and other changes to developments would be considered against the outline planning permission, any new policies can only over-ride on matters which have not already been established in principle by the outline permission.</p>	



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/033	Climate Emergency	CE2 Zero Carbon development			6		<p>Section 6. of draft new policy CE2 introduces a new requirement to adopt the use of energy performance construction quality assurance methods currently being used in the UK (such as Passivhaus, AECB or BEPIT) to minimise the energy performance gap. These requirements did not exist in the previous policy, so the approved scheme has not adopted an energy performance quality assurance method. As the mentioned certification methodologies represent industry best practice it is anticipated that the current building fabric and systems design would not meet the requirements of the methodology. Section 6. of draft new policy CE2 also introduces the requirement for Major Developments to monitor energy consumption and submit the data to London Borough of Newham.</p> <p>Recommendation</p> <p>SHL suggests that:</p> <ul style="list-style-type: none"> <li>• LBN clarifies in the supporting text relating to policy that the policy requirements only relate to the determination of planning applications moving forwards and that the policy requirements will not be retrospectively applied to consented / legacy schemes (or flexibility given at the very least).</li> </ul>	<p>Comment noted. Planning applications are determined against the current Development Plan. Reserved matters and other changes to developments would be considered against the outline planning permission, any new policies can only over-ride on matters which have not already been established in principle by the outline permission.</p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/148	Climate Emergency	CE2 Zero Carbon development						The Berkeley Group is supportive of the Council adopting measures that will help to tackle this important issue [minimising climate change];....	Support noted.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/149	Climate Emergency	CE2 Zero Carbon development						....however, climate change policies should be outcome focussed - energy policies that are too detailed can limit freedom to deliver the most suitable and effective long term carbon/sustainable and design strategies for a site. Flexibility will also be important to allow for the pace of technological changes.	Comment noted. The Council would consider alternative approaches to meeting targets - no specific technology is mandated or encouraged.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/150	Climate Emergency	CE2 Zero Carbon development						Every development and its site-specific solution to climate change and environmental sustainability will differ, therefore the Berkeley Group's preference is for a technology agnostic approach to ensure that the local context is considered.	Comment noted. The policy does not mandate particular technologies, noting the requirement to not use fossil fuels on site.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/151	Climate Emergency	CE2 Zero Carbon development						The Berkeley Group supports the principle of achieving zero carbon development and using as little energy as possible within its developments....	Support noted.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/154	Climate Emergency	CE2 Zero Carbon development						The requirements outlined within Policy CE2 are therefore supported in principle...	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/155	Climate Emergency	CE2 Zero Carbon development						<p>...however they [the requirements outlined in CE2] do outline some fairly detailed requirements which may not always be possible to achieve. Further flexibility should therefore be built into this policy which ensures the optimum reduction in carbon emissions is reached whilst taking account of site specific circumstances and viability.</p>	<p>Comment noted. The overall policy objective is that net zero buildings will use ultra-low amounts of energy, use low carbon heat, and contribute to the generation of renewable energy on-site. They will also have been constructed with low levels of embodied carbon.</p> <p>The evidence base demonstrates that these targets are deliverable and viable.</p>

Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/381	Climate Emergency	CE2 Zero Carbon development					<p>We have not suggested prescriptive amendments to the below policy but would ask that this is reviewed against the London Plan policies and updated to more closely align itself with the approach taken by the GLA for consistency. The London Plan does not include prescriptive standards by use for example: 2. New development should use as little energy as possible to heat a building over a year, meeting the following standards:</p> <ul style="list-style-type: none"> <li>a. All new dwellings should achieve a space heating demand of less than 20 kWh/m2 GIA/ yr.</li> <li>b. All non-domestic buildings except industrial buildings should achieve a space heating demand of less than 20 kWh/m2 GIA/yr.</li> <li>c. All new Industrial buildings should achieve a space heating demand of less than 15 kWh/m2 GIA/yr.</li> </ul> <p>4. New development should use as little energy as possible over a year and should meet the following standards:</p> <ul style="list-style-type: none"> <li>a. All new dwellings should achieve an Energy Use Intensity (EUI) of no more than 35 kWh/m2 GIA/yr.</li> <li>b. New non-domestic buildings should achieve an Energy Use Intensity (EUI) of no more than the following by the following use: <ul style="list-style-type: none"> <li>i. Student accommodation – 35 kWh/m2 GIA/yr.</li> <li>ii. Offices, Retail, Higher Education Teaching facilities, GP surgeries, Hotels– 55 kWh/m2 GIA/yr.</li> <li>iii. Schools – 65 kWh/m2 GIA/yr.</li> <li>iv. Leisure, warehouses, and light</li> </ul> </li> </ul>	<p>The policy approach has not changed, in light of our climate commitments. The Climate Change Evidence Base sets out why these policies are necessary and the methodology behind them. The Climate Change Evidence Base also outlines that this is technically and financially feasible. Please see wording in Policy CE2.</p>
-------------	-------------------------------------------------------------	-----------------	-------------------	-----------------------------	--	--	--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

									<p>industrial units – 100 kWh/m2 GIA/yr. An additional 20 kWh/m2 GIA/yr budget is available for warehouses/ industrial units that operate for 24 hours a day.</p> <p>5. 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, in accordance with the following requirements:</p> <p>a. As a minimum, the amount of energy generated in a year must be:</p> <p>i. at least 80 kWh/m; per building footprint per annum for all building types except industrial buildings;</p> <p>and</p> <p>ii. at least 120 kWh/m2 per building footprint per annum for industrial buildings</p> <p>b. Where it can be sufficiently evidenced that it is not technically possible for the amount of energy generated in a year through onsite renewable energy production to match or exceed the predicted annual energy demand of the building, the applicant should fund renewable energy generation (equivalent to the shortfall) elsewhere in the borough through a cash-in-lieu contribution.</p>	
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/022	Climate Emergency	CE2 Zero Carbon development					Stratford East supports the ambition of the policy to push standards for more energy efficient and sustainable buildings to help address climate change.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/023	Climate Emergency	CE2 Zero Carbon development			3			Part 3 requires new development not to use fossil fuels for heat or energy or be connected to the gas grid. Stratford Waterfront and Bridgewater Triangle, as well as most other major sites in Queen Elizabeth Olympic Park have obligations to connect to the existing district energy network (DEN) that serves the area and by doing so they would not be able to comply with this policy until the DEN has decarbonised. The DEN is developing a decarbonising strategy and has the potential to provide low carbon energy to a wider area in line with London Plan policy and the existing LLDC Local Plan. Therefore, we recommend amendments to the policy are required to avoid any potential conflicts with London Plan policy and they should also encourage development to connect to the existing DEN in line with the Mayor's aspirations.	The policy approach has changed to clarify the timeframe regarding decarbonisation of existing fossil fuel powered heat networks. Please see the new wording in Policy CE2.2. The policy strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/024	Climate Emergency	CE2 Zero Carbon development						However, the requirement in Part 5 for buildings to generate the equivalent of their own energy through on site renewables is mainly reliant on the available roof area for photovoltaic cells. There are also competing policy requirements for roof spaces, such as green roofs and amenity spaces, as well as rooftop plant.	<p>Comment noted. The Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. Improvements to biodiversity should be directed elsewhere (such as ground level landscaping).</p> <p>The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.</p>
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/025	Climate Emergency	CE2 Zero Carbon development						In addition, in dense urban locations, overshadowing will also constrain where photovoltaic cells can be effective.	<p>Comment noted. Overshadowing of solar panels is a material consideration in planning terms, and the London Plan Policy D9 Part C (2f) requires that tall buildings avoid having significant detrimental effect on solar energy generation on adjoining buildings.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/026	Climate Emergency	CE2 Zero Carbon development						Consequently, it is unlikely based on current technology that many major residential schemes would be able to meet the policy requirements, with most development providing a financial contribution to off-set the loss and effectively act as a tariff.	Comment noted. The Climate Change Evidence Base modelled a range of residential and industrial typologies, demonstrating that townhouse and low-rise typologies can comply on site and that all residential typologies can generate a minimum of 80kWh/m2. Both industrial typologies demonstrated compliance with the policy.
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/027	Climate Emergency	CE2 Zero Carbon development						Furthermore, if off-setting costs are applied these should be clearly set out and proposed at an affordable level.	Comment noted. The methodology behind the offsetting costs are set out in the Climate Change Evidence Base, based on the current price and performance of a PV system.
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/028	Climate Emergency	CE2 Zero Carbon development			5			<p>London Plan Policy SI 2 Part A 3) already seeks to maximise opportunities for on site renewable energy, with off-set contributions where the reductions sought by the policy cannot be met.</p> <p>The London Plan approach is more reasonable, responsive to different types of development and provides a more comprehensive approach to maximising energy efficiency in buildings.</p> <p>Accordingly, Stratford East recommends further refinements to Part 5 of the policy to be consistent with London Plan</p>	The policy approach has not changed, the Climate Change Evidence Base sets out why maximising solar PV on site is necessary, and the methodology behind a solar PV offset to where a building cannot meet operational annual net zero. The Climate Change Evidence Base also outlines that this is technically and financially feasible. Please see wording in Policy CE2.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Policy SI 2 to maximise on-site renewables and if tariffs are proposed, these are set at affordable levels.	
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/091	Climate Emergency	CE2 Zero Carbon development						[Appendix A] The focus on net zero carbon development is supported, however, some detailed comments are provided.	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/092	Climate Emergency	CE2 Zero Carbon development			CE2.2			[Appendix A] The space heating targets in Criterion (2) are onerous for certain types of building and a full assessment of the anticipated achievability of the targets should be provided.	The Climate Change Evidence Base indicates the achievability of the space heating demand targets, and the cost impacts of meeting those targets. This is indicated in the updated viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/093	Climate Emergency	CE2 Zero Carbon development			CE2.5			<p>[Appendix A] The benefit of an absolute target for renewable energy generation as set out in Criterion 5 is questioned. London Plan SI 2 requires the opportunity for renewable energy generation to be maximised, but stops short of setting minimum requirements, which is a sensible approach in the context of competing demands for roof space of developments and the need to balance out uses on a case-by-case basis.</p>	<p>A wording change has not been made, as the target for renewable energy generation is an intrinsic part of the policy as a whole as set out in the Climate Change Evidence Base. The evidence base also outlines that that roof space should be prioritised for solar photovoltaic panels.</p> <p>The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-054	University College London	Reg18-E-054/013	Climate Emergency	CE2 Zero Carbon development						<p>UCL notes that draft Policy CE2 states that "new development should not use fossil fuels for heat or energy". UCL understands that within the LLDC Concession Area (where UCL East is located) there is a legal obligation to connect to the district heating network (DHN). UCL note that the DHN's current increased carbon factors, comprised environmental performance and reliance on fossil fuels do not align with the aspirations of draft Policy CE2 and conflict with UCL's ambitions and commitments for achieving net zero carbon. The DHN's current performance has significant implications for Phase 1 of UCL East, including performance against targets as established in the relevant planning consents, as well in future for the plots brought forward under Phase 2 of UCL East. As a result, UCL would welcome further clarity within Policy CE2 with regard to scenarios where development is constrained by connections to the DHN.</p> <p>Given the related implications for both Phase 1 and 2 of UCL East, UCL would be grateful for the opportunity to work and discuss the implications of connecting to the DHN further with LBN.</p>	<p>The policy approach has changed to clarify the timeframe regarding decarbonisation of existing fossil fuel powered heat networks. Please see the new wording in Policy CE2.2. The policy strongly encourages the decarbonisation of existing fossil fuel powered heat networks. A development may connect to a heat network powered by gas only where there is an fully funded decarbonisation plan that will be implemented within the lifetime of the plan. The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan, nor will the Council support the installation of new fossil fuel powered heat networks.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-050	Anchor	Reg18-E-050/032	Climate Emergency	CE3 Embodied Carbon						While we support the aspiration to minimise embodied carbon, this should not compromise development viability and housing delivery. Policy CE3 exceeds the optional standards set out in building regulations and is therefore inconsistent with national policy; both the Written Material Statement of 2015 and Planning Practice Guidance confirm (as highlighted in the Worthing Local Plan Inspector's Report) that local energy performance standards can't be set above the equivalent for Code for Sustainable Homes Level 4.	This wording change has not been made. The Written Ministerial Statement of 2015 was superseded in December 2023, and we do not consider that changes the ability for councils to set their own standards. Both the Climate Change Evidence Base and the Viability assessment indicate how the policy is achievable, deliverable and viable.
Reg18-E-050	Anchor	Reg18-E-050/034	Climate Emergency	CE3 Embodied Carbon						Policy CE3 is also not clear about the effect on commuted sums if the post-completion emissions are higher than predicted at application stage.	Comment noted. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact. The policy does not contain requirements regarding commuted sums.
Reg18-E-077	Ballymore Group	Reg18-E-077/048	Climate Emergency	CE3 Embodied Carbon						We consider that draft policy CE3 should be amended to require whole life cycle carbon assessments for GLA referable schemes in accordance with the London Plan, rather than all major developments	This wording change has not been made. We did not consider this change to be appropriate as we consider it necessary to meet our climate objectives.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/117	Climate Emergency	CE3 Embodied Carbon						P.241 CE3: Embodied carbon - 2. We suggest adding an extra line (2.e): How a development includes as much recycled material as possible (provided they do not off-gas harmful chemicals more so than their newly manufactured counterparts), such as benches made from recycled plastic and fully recycled indoor wall tiles, and floor/wall tiles with a high percentage of recycled content. (Examples of these below.) <a href="https://www.alusid.co.uk">https://www.alusid.co.uk</a> <a href="https://www.ecofriendlytiles.co.uk/products/">https://www.ecofriendlytiles.co.uk/products/</a>	The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.
Reg18-E-133	Climate You Change	Reg18-E-133/118	Climate Emergency	CE3 Embodied Carbon			CE3.5			P.241 - 5. 'Major developments are expected to meet embodied carbon limits of less than 500kg' Could this target be lower?	This wording change has not been made, as the evidence base supports the use of a figure around 500kg.
Reg18-E-133	Climate You Change	Reg18-E-133/119	Climate Emergency	CE3 Embodied Carbon				3.222		P.241 Justification - 3.222 Could there be very big deterrent based fines when developers noticeably overshoot their design and planning targets on embodied and operational carbon, used to be granted planning permission? Could they be made aware at the time of seeking planning permission, that they must stay within their targets to not incur such fines after building completion?	This wording change has not been made. We did not consider this change to be necessary, due to careful monitoring of energy statements submitted at application stage and ensuring compliance with the standards post approval.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/120	Climate Emergency	CE3 Embodied Carbon					CE3.1 P.242 – Implementation, CE3.1 ‘Developments should show consideration of embodied carbon...This could be demonstrated in a Design and Access Statement’ Comment: Could this be mandatory?		This wording change has not been made. We did not consider this appropriate, as the policy asks major development to show consideration of embodied carbon in Policy CE3.1, before setting a target in Policy CE3.5 that would need to be complied with.
Reg18-E-133	Climate You Change	Reg18-E-133/121	Climate Emergency	CE3 Embodied Carbon					CE3.2 P.242 CE3.2 ‘an estimate of the percentage of the new build development which will be made up of existing façades, structures, buildings’ Comment: Could this be taken a step further regarding the reuse of individual existing materials within the building? Could there be minimums set for old concrete being crushed on-site cleaned and screened for use as aggregate in new concrete mixes: <a href="https://gambrick.com/can-concrete-be-recycled/">https://gambrick.com/can-concrete-be-recycled/</a>		The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.  Policy CE5 considers the circular economy, helping the built environment industry to move away from using a large amount of materials, reducing the quantity of material thrown away at the end of life and allowing for future adaption, reuse and retrofit of buildings.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/122	Climate Emergency	CE3 Embodied Carbon						<p>Could there be minimums set for flat pieces of broken concrete being used to make 'urbanite' flooring for pathways and ideally even the ground floor of buildings, plus features such as supports of benches and for dwarf walls?  <a href="http://foundationdesignla.blogspot.com/2011/08/exterior-hardscape-going-green.html">http://foundationdesignla.blogspot.com/2011/08/exterior-hardscape-going-green.html</a>  <a href="https://www.abdallahhouse.com/2013/12/crazy-paving-with-urbanite.html">https://www.abdallahhouse.com/2013/12/crazy-paving-with-urbanite.html</a></p>	<p>The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.</p> <p>Policy CE5 considers the circular economy, helping the built environment industry to move away from using a large amount of materials, reducing the quantity of material thrown away at the end of life and allowing for future adaption, reuse and retrofit of buildings.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/123	Climate Emergency	CE3 Embodied Carbon						<p>Pathways could contain permeable, stable material, such as gravel in the cracks between concrete pieces (not crushed concrete as it will end up airborne, releasing fine silica particles which can cause lung damage upon inhalation and could cause leachate of heavy metals into ground water and soil) or soil and grass</p>	<p>The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.</p> <p>Policy CE5 considers the circular economy, helping the built environment industry to move away from using a large amount of materials, reducing the quantity of material thrown away at the end of life and allowing for future adaption, reuse and retrofit of buildings.</p>



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/124	Climate Emergency	CE3 Embodied Carbon						Indoor ground floor flooring could have gaps filled with small amounts of virgin concrete and then can use a concrete floor sander to produce an attractive floor suitable for a lobby.	<p>The Local Plan addresses this topic through the Climate Emergency policies. However it cannot deliver the change you have requested, as the Local Plan cannot control the exact materials used in construction if other policies are complied with.</p> <p>Policy CE5 considers the circular economy, helping the built environment industry to move away from using a large amount of materials, reducing the quantity of material thrown away at the end of life and allowing for future adaption, reuse and retrofit of buildings.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/125	Climate Emergency	CE3 Embodied Carbon						<p>Could there be minimums set for reuse of other materials, such as old, uncontaminated, structurally sound wood to be reused in non-load bearing stud walls?</p>	<p>This wording change has not been made. We did not consider this change to be appropriate, as every development that considers embodied carbon is going to be different.</p> <p>Policy CE5 considers the circular economy, helping the built environment industry to move away from using a large amount of materials, reducing the quantity of material thrown away at the end of life and allowing for future adaptation, reuse and retrofit of buildings. An embodied carbon statement could demonstrate options for retaining and reusing existing buildings and structures, as well as considering reuse of existing materials, façades, structures, buildings.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/126	Climate Emergency	CE3 Embodied Carbon						Could it be mandatory to safely, creatively, aesthetically and practically reuse as many materials as possible, such as old cupboards, reused in common, residential and utilities/operations spaces, according to condition, sturdiness, reasonable practical application, attractiveness etc.	This wording change has not been made. We did not consider this change to be appropriate, as every development that considers embodied carbon is going to be different. Policy CE5 considers the circular economy, helping the built environment industry to move away from using a large amount of materials, reducing the quantity of material thrown away at the end of life and allowing for future adaption, reuse and retrofit of buildings. An embodied carbon statement could demonstrate options for retaining and reusing existing buildings and structures, as well as considering reuse of existing materials, façades, structures, buildings.
Reg18-E-133	Climate You Change	Reg18-E-133/127	Climate Emergency	CE3 Embodied Carbon			CE3.3			P.242 CE3.3: 'A development proposing Modern Methods of Construction (MMC) should demonstrate... • 'That overseas manufacture of MMC elements has been avoided.' Comment: We suggest that overseas manufacture of MMC elements is not avoided where the emissions lowering advantage of shipping in prefabricated elements is better than using locally manufactured elements with an overall higher emissions footprint, i.e., if prefabricated Biofiber	A change to the policy approach has not been made. The Climate Change Evidence Base sets out the approach to MMC, and why overseas manufacture is to be avoided. The origin of the MMC module would be assessed at the planning application stage.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Hempcrete blocks were imported, provided the net effect greenhouse gas emissions is lower than the next best alternatives manufactured in or closer to the UK.	
Reg18-E-133	Climate You Change	Reg18-E-133/128	Climate Emergency	CE3 Embodied Carbon			CE3.3			P.242 CE3.3: • 'A quantification of amount of wastage - a typical figure is five per cent.' Comment: Could the developers be required to bring the wastage figure as close to zero as possible by providing left over materials to local building supply businesses, by ensuring that leftover bits of wood could go to businesses who will chip the wood and use in new products, left over bits of unused concrete can be used for aggregate etc.?	The wording change has not been made. The 5% figure comes from our evidence base. We cannot control how the waste of building construction is used, however we can encourage this through the embodied carbon policies. Policy CE5 considers the circular economy, helping the built environment industry to move away from using a large amount of materials, reducing the quantity of material thrown away at the end of life and allowing for future adaption, reuse and retrofit of buildings.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/023	Climate Emergency	CE3 Embodied Carbon						Draft Policy CE3 (Embodied Carbon) includes a number of requirements related to embodied carbon across a building's life cycle. The proposed requirement at part 5 that sets a 500 kgCO2e/m2 limitation for major developments should not be applicable for data centre typologies. The limit has been informed by LETI and RIBA targets which have only been set for 'best practice' for offices, retail, residential and educational typologies. This is about 50% less than the GLA benchmark values for major development requirements. It appears that the draft Plan assessment scope for the embodied carbon aligns with the LETI element scope not the GLA Whole Life Carbon Assessment Guidance Scope, therefore clarity should be provided.	This wording change has not been made. We did not consider this change to be appropriate as we consider it necessary to meet our climate objectives. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact.
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/024	Climate Emergency	CE3 Embodied Carbon			5			For data centre schemes, the elemental breakdown and distribution would expect to differ significantly from these listed typologies, and therefore would be deemed unsuitable for comparison. For example, typical MEP contribution for these typologies sits between 15-20%, whereas for a data centre building, this would expect to be between 50-60%.  Cundall's previous experience has shown that data centre schemes typically have an upfront embodied carbon of ~1,000 kgCO2e/m2.	A wording change has been not been made. In all cases, the development should demonstrate efficiency, with development minimising the amount of embodied carbon.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Recommendation 4: Amend draft Policy CE3 part 5 to exclude reference to data centre development.	
Reg18-E-130	Hadley Property Group	Reg18-E-130/149	Climate Emergency	CE3 Embodied Carbon						This policy should be amended to require whole life cycle carbon assessments for GLA-referable schemes in accordance with the London Plan, rather than all major developments.	This wording change has not been made. We did not consider this change to be appropriate as we consider it necessary to meet our climate objectives. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact. This is indicated in the updated viability assessment.
Reg18-E-096	L&Q	Reg18-E-096/025	Climate Emergency	CE3 Embodied Carbon						[LBN has set ambitious targets through their climate change policies. Whilst we are supportive of this, we are concerned that some of the policies set targets that have not been fully tested to ensure they are deliverable across a range of schemes (both in terms of type and sizes). This	Comment noted. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact. This is indicated in the updated viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										includes] [...] Policy CE3, which requires schemes to achieve embodied carbon limits of less than 500 kg CO/m2 [...] [Further evidence is required to demonstrate whether these targets are deliverable.]	
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/125	Climate Emergency	CE3 Embodied Carbon						Draft Policy CE3 sets a requirement for developments to meet an embodied carbon target of less than 500kg CO2/m2. However, this does not appear to have been fully informed by a viability assessment. Namely, the Embodied Carbon Topic Paper states that "a more robust evidence base with a wider range of typologies to inform the targets set is being developed and should be available summer 2022. From this viability assessments with deliverability and cost impacts can be undertaken." However, this paper does not appear to have been published within the evidence base? Clarity should be provided on whether this has been viability tested.	Comment noted. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact. This is indicated in the updated viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/060e	Climate Emergency	CE3 Embodied Carbon			5			<p>c. Draft Policy CE3 (Embodied carbon)  One of the three long-term priorities in SEGRO's 'Responsible SEGRO' framework is to champion low-carbon growth. SERGO aims to reduce carbon emissions from its development activity and the operation of its existing buildings, and eliminate them where possible, and is targeting becoming net-zero carbon by 2030.</p> <p><u>SEGRO therefore supports the approach set out in draft Policy CE3</u>, including part (5) which states that major developments are expected to meet embodied carbon limits of less than 500kgCO<sub>2</sub>/m<sup>2</sup>.</p>	Support noted.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/034	Climate Emergency	CE3 Embodied Carbon						<p>CE3: Embodied Carbon - Clarification This policy is an entirely new addition to the Local Plan it is anticipated that many of the requirements and recommendations will not have been accounted for within the current design of the approved scheme. Section 4. and section 5. of draft new policy CE3 introduce requirements for the assessment of Whole Life Carbon and stipulate a carbon intensity target. As the new embodied carbon target represents industry best practice, it is anticipated that the current scheme design would not deliver compliance with the target.</p> <p>Recommendation SHL suggests that:</p> <ul style="list-style-type: none"> <li>• LBN clarifies in the supporting text relating to policy that the policy requirements only relate to the determination of planning applications moving forwards and that the policy requirements will not be retrospectively applied to consented / legacy schemes (or flexibility given at the very least).</li> </ul>	Comment noted. Planning applications are determined against the current Development Plan. Reserved matters and other changes to developments would be considered against the outline planning permission, any new policies can only over-ride on matters which have not already been established in principle by the outline permission.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/152	Climate Emergency	CE3 Embodied Carbon						[The Berkeley Group supports the principle of...]considering embodied carbon as early as possible in the planning process	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/156	Climate Emergency	CE3 Embodied Carbon			5			Similarly Policy CE3 (point 5) requires major developments to meet embodied carbon limits of less than 500kg CO2/m2, which is specific and the overall contribution to reducing energy consumption and incorporating sustainability measures should be considered alongside any proposed embodied carbon limit. Proposed policy wording change: <del>5. Major developments are expected to meet embodied carbon limits of less than 500kg CO2/m2.</del>	This wording change has not been made. We did not consider this change to be appropriate as we consider it necessary to meet our climate objectives. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact. This is indicated in the updated viability assessment.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/094	Climate Emergency	CE3 Embodied Carbon						[Appendix A] It is noted that the intent of this policy aligns with the London Plan and supporting guidance.	Comment noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/095	Climate Emergency	CE3 Embodied Carbon			CE3.5			[Appendix A] However, criterion 5 sets a target which does not align with the GLA's minimum benchmark, and therefore there should be justification of why higher targets are deemed to be achievable in Newham.	Comment noted. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact. This is indicated in the updated viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/041	Climate Emergency	CE3 Embodied Carbon					<p>Policy CE3 'Embodied Carbon'</p> <ol style="list-style-type: none"> <li>1. Embodied Carbon should be considered as early as possible in the planning process, as upfront embodied carbon contributes the largest proportion of embodied carbon across a building's life cycle.</li> <li>2. The planning of a building should consider: <ol style="list-style-type: none"> <li>a. How a building is to be built; and</li> <li>b. how energy and waste can be minimised throughout the construction process; and</li> <li>c. how a building could be deconstructed in future; and</li> <li>d. how a building could facilitate future modification, adaption or retrofitting work.</li> </ol> </li> <li>3. Modern Methods of Construction (MMC) should be used carefully and, where appropriate, ensuring that the use of MMC complies with other energy policies.</li> <li>4. Major developments should undertake a Whole Life Carbon assessment in accordance with the requirements outlined in London Plan (2021) Policy SI 2.</li> <li>5. Major developments are expected to meet embodied carbon limits of less than 500kg CO2/m2.</li> </ol> <p>Unite would comment in relation to this policy:</p>	Comment noted.	

<p><b>Comment Response</b></p>	
<p><b>Comment</b></p>	
<p><b>Implementation</b></p>	<ul style="list-style-type: none"> <li>The policy is broadly consistent with London Plan Policy SI 2 and Unite as a business are proactively following a net zero pathway by 2030- please go to Unite's website page for more information on their net zero pathway. As such Unite are supportive of the climate emergency agenda and are undertaking relevant assessments of the total life cycle carbon / energy / greenhouse gases used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product on all new major development sites.</li> </ul>
<p><b>Justification</b></p>	
<p><b>Clause</b></p>	
<p><b>Introduction</b></p>	
<p><b>Site allocation</b></p>	
<p><b>Policy</b></p>	
<p><b>Chapter</b></p>	
<p><b>Comment Reference</b></p>	
<p><b>Representor</b></p>	
<p><b>Representation Reference</b></p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/042	Climate Emergency	CE3 Embodied Carbon						<ul style="list-style-type: none"> <li>As the draft policy CE3 however states there are no universal standard targets for embodied carbon due to a limited evidence base across multiple typologies. Whilst baseline targets are provided by bodies such as London Energy Transformation Initiative (LETI) and Royal Institution of British Architects (RIBA), these still represent an average and from a still limited data set. As such this may not be deliverable or justified on a site-by-site basis, particularly where there are specific constraints such as listed buildings.</li> <li>There is also no set embodied carbon targets (kg CO2/m2) or policy requirement indicated in the London Plan.</li> <li>The whole life carbon assessment submitted in accordance with the requirements outlined in London Plan (2021) Policy SI 2 will be sufficient to demonstrate what embodied carbon limit/ and/or target a new development can deliver on a site-by-site basis depending on specific site circumstances (including where retrofit and rebuild does occur).</li> </ul>	Comment noted. We did not consider this change to be appropriate as we consider it necessary to meet our climate objectives. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact. This is indicated in the updated viability assessment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/043	Climate Emergency	CE3 Embodied Carbon						<p>Recommendations:</p> <p>As a result of the above comments, Unite make the following recommendations in relation to draft policy CE3:</p> <ul style="list-style-type: none"> <li>Remove the 500kg CO2/m2 target from draft policy wording. Whilst reference can be made to such guidance there is limited evidence base, particularly in the Newham area, as to what targets are suitable and substantiating this on a site-by-site basis.</li> </ul>	This wording change has not been made. We did not consider this change to be appropriate as we consider it necessary to meet our climate objectives. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact. This is indicated in the updated viability assessment.
Reg18-E-133	Climate You Change	Reg18-E-133/129	Climate Emergency	CE4 Overheating			CE4.1			<p>P.244 CE4 Overheating - 1. All new development must consider the potential of overheating...This must be demonstrated through.'</p> <p>Comment: We suggest adding 'd' to the list, with a mandatory requirement for green rooves where space is not otherwise taken up by solar panels.</p>	<p>Comment noted. The Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. Improvements to biodiversity should be directed elsewhere (such as ground level landscaping).</p> <p>The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/130	Climate Emergency	CE4 Overheating					3.21 4	We do understand from Newham's Local Plan that there is a greater emphasis placed on roof space for solar panels over green rooves with less space given over to the latter. We understand this (from reading P.236 CE2 3.214)	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/131	Climate Emergency	CE4 Overheating			CE4.1			P.244 CE4 Overheating - 1. All new development must consider the potential of overheating...This must be demonstrated through:' Comment: We suggest adding 'e' to the list, with a mandatory requirement for tilt and turn windows to aid with removing hot air from buildings during hot weather.	This wording change has not been made. We did not consider this change to be appropriate as the overheating policy already considers large openable areas of windows as part of the policy.
Reg18-E-133	Climate You Change	Reg18-E-133/132	Climate Emergency	CE4 Overheating						We also suggest adding 'f' to require the situating of windows to create good airflow (additionally to create good light, to cut down on energy for lighting, alongside creating good solar gains during cold weather). This should be in conjunction with perimeter shaping and window directions within apartment layouts, to maximise efficient cooling of residences and each building as a whole.	This wording change has not been made, as it is already part of the policy - passive design considerations including orientation of buildings, reducing glazing, increasing the openable area of windows, ensuring dual aspect and cross ventilation and external shading.
Reg18-E-133	Climate You Change	Reg18-E-133/133	Climate Emergency	CE4 Overheating						Additionally, we suggest a mandatory requirement for thermal black-out blinds and thick insulating curtains in any property being provided as part/fully furnished.	This wording change has not been made. We did not consider this change to be appropriate as the Local Plan cannot control if occupiers install blinds or curtains.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/134	Climate Emergency	CE4 Overheating					3.22 6	P.244 – Justification 3.226: ‘Design elements that can mitigate overheating risk include the orientation of buildings, reducing glazing... and external shading.’ Comment: Could the orientation of buildings not be used to mitigate heating, as this could impact on solar gains in colder weather?	This wording change has not been made, as it is already part of the policy - passive design considerations including orientation of buildings, reducing glazing, increasing the openable area of windows, ensuring dual aspect and cross ventilation and external shading.
Reg18-E-133	Climate You Change	Reg18-E-133/135	Climate Emergency	CE4 Overheating						Could there instead be a planning requirement for roof and window overhangs designed to minimise the ingress of summer sun (when it is angling in from a steeper gradient), whilst allowing for the ingress of the lower winter sun, or could there be an alternative planning requirement for electronically operated external window shutters? (The latter could perhaps be a bit of an extreme measure in our climate but with climate change, perhaps not.)	This wording change has not been made, as it is already part of the policy - passive design considerations including orientation of buildings, reducing glazing, increasing the openable area of windows, ensuring dual aspect and cross ventilation and external shading.
Reg18-E-133	Climate You Change	Reg18-E-133/136	Climate Emergency	CE4 Overheating						Given the improved thermal mass, helping the structure to retain more heat during cooler spells and to insulate from heat in hotter weather, alongside the evaporative cooling nature of green rooves, then we would like to suggest that enough consideration is given to the benefits of green rooves. They can also be planted with pollinator friendly plants.	This wording change has not been made, as it is already part of the policy - passive design considerations including installing cool roofs (reflective and solar PV), green roofs and urban greening.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/137	Climate Emergency	CE4 Overheating						We understand that there needs to be a balance struck here, with the focus on what has the greatest impact on lowering greenhouse gas emissions, including the embodied and operational carbon of solar panels, plus batteries (including the environmental degradation of mining the materials for these).	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/138	Climate Emergency	CE4 Overheating				CE 5.1		P.246 CE5 Retrofit and circular economy - Implementation CE5.1 'These best practice fabric improvements could include improvements to building insulation, new windows, heat pumps, PV solar panels and mechanical ventilation with heat recovery (MVHR).' To this list we also suggest adding 'thermal insulation paint' and 'insulating lining paper'; both used to reflect heat back into a room.	This wording change has not been made. The examples of best practice fabric improvements are not intended as a list of all improvements that could be made.
Reg18-E-133	Climate You Change	Reg18-E-133/139	Climate Emergency	CE4 Overheating						We suggest that if the latter is included, that attention be paid to the type of insulating lining paper, to choose one with the best insulation performance. See below: <a href="https://www.erfurtmav.com/erfurt-mav-wallpaper-products/insulating-wall-coverings/product/159-insulating-lining-papaer-grapite-plus">https://www.erfurtmav.com/erfurt-mav-wallpaper-products/insulating-wall-coverings/product/159-insulating-lining-papaer-grapite-plus</a> We understand that the benefits of the insulation lining paper suggestion above do need balancing against the difficulty of disposing of the paper at the end of it's life span and that this is also a factor for consideration.	This wording change has not been made. The examples of best practice fabric improvements are not intended as a list of all improvements that could be made.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/025	Climate Emergency	CE4 Overheating						<p>Draft Policy CE4 (Overheating) includes a series of proposed requirements geared towards mitigating the impact of overheating. By their nature, data centres require extensive mechanical cooling. As such it will be challenging to comply with parts 1c, 2 and 3 for data centre development, with the exception of the ancillary office spaces.</p> <p>Recommendation 5: Amend draft Policy CE4 to exclude reference to data centre development.</p>	<p>A wording change has not been made - Policy CE4.1c states "c. All new non-residential development is expected to demonstrate how overheating potential has been minimised, reflecting the end use of the building".</p> <p>We consider that the policy has enough flexibility for a variety of uses, with all development should be designed to minimise the need for active cooling as much as possible.</p>
Reg18-E-033	Port of London Authority	Reg18-E-033/023	Climate Emergency	CE4 Overheating						In principle welcome policy CE4 on the need for all new development to consider the potential of overheating.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-033	Port of London Authority	Reg18-E-033/024	Climate Emergency	CE4 Overheating						Whilst it is noted that policy D7 (Neighbourliness) is referenced in the policy links section and a direct reference should be included in the supporting text to highlight the links between overheating and the need to ensure that developments are fully designed in line with the Agent of Change principle, particularly with regard to noise.	<p>Comment noted. A wording change has been made, noting that there may be circumstances where 'active cooling' is required to mitigate a significant noise, pollution or 'agent of change' issue. Please see the new wording in CE4.3.</p> <p>Policy H11 Housing Design quality also requires the provision of alternative aspects where poor external conditions including noise and visual amenity exist.</p>
Reg18-E-033	Port of London Authority	Reg18-E-033/025	Climate Emergency	CE4 Overheating						Where the borough has a number of safeguarded wharves, which can operate up to 24 hours a day in line with the tides, it is vital that nearby new noise sensitive development is designed in such a way to ensure there are no conflicts of use and disturbance	<p>Comment noted. A wording change has been made, noting that there may be circumstances where 'active cooling' is required to mitigate a significant noise, pollution or 'agent of change' issue. Please see the new wording in CE4.3.</p> <p>Policy H11 Housing Design quality also requires the provision of alternative aspects where poor external conditions including noise and visual amenity exist.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-033	Port of London Authority	Reg18-E-033/026	Climate Emergency	CE4 Overheating						In order to ensure the amenity of future residents are protected, part of the design of new development may require various mitigation measures including fixed shut windows and/or winter gardens in some cases to protect against inappropriate noise levels and ensure agreed internal noise levels are met, including during the night	<p>Comment noted. A wording change has been made, noting that there may be circumstances where 'active cooling' is required to mitigate a significant noise, pollution or 'agent of change' issue. Please see the new wording in CE4.3.</p> <p>Policy H11 Housing Design quality also requires the provision of alternative aspects where poor external conditions including noise and visual amenity exist.</p>
Reg18-E-033	Port of London Authority	Reg18-E-033/027	Climate Emergency	CE4 Overheating						Therefore as part of the assessment of any required mitigation measures to protect future residents from inappropriate internal noise levels, the potential for overheating must also be considered in this context so that that an appropriate ventilation/cooling strategy is in place to that can if required enable windows to be kept closed by the occupant for noise mitigation purposes. The highlighting of this link between overheating and the Agent of Change principle must therefore be set out in the supporting text of this policy.	<p>Comment noted. A wording change has been made, noting that there may be circumstances where 'active cooling' is required to mitigate a significant noise, pollution or 'agent of change' issue. Please see the new wording in CE4.3.</p> <p>Policy H11 Housing Design quality also requires the provision of alternative aspects where poor external conditions including noise and visual amenity exist.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-082	Resident	Reg18-E-082/047	Climate Emergency	CE4 Overheating						<p>11. Climate Change</p> <ul style="list-style-type: none"> <li>• Page.244 (CE4: Overheating). With temperatures likely to increase in the coming years and impact of heat island effects in Newham there is a need to ensure that buildings are safe for occupation. Increase thermal efficiency of new build housing especially in residential blocks coupled with a lack of circular ventilation and heat island effect in urban London have contributed towards extreme temperatures in new developments and deaths from heat stress. <b>Passive cooling design may not be enough to mitigate against extreme heat therefore mechanical ventilation systems may be required.</b> Further temperature monitoring of residential buildings (internal) should be required as part of the planning conditions process post-occupancy.</li> </ul>	A wording change has been made. Please see the new wording in Policy CE5 Overheating, that considers that noisy or polluting uses may need to be mitigated against with active cooling.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-088	Resident	Reg18-T-088/022	Climate Emergency	CE4 Overheating						<p>[Change it] Houses in the has very low level roof because if we go back 30-40 years before there was no concept of summer or hot weather, but now a days weather/climate is changing rapidly we need roof fans, air condition, ped fans etc to bring temperature down, in low level roof we can't fix the roof fan because of health and safety issues. Now we need to do 2 things here first we need property survey or on local base housing assessment to find out how many houses have low level roof, then we need to rebuilt or encourage resident and inform them safety measures, how to handle hot weather.</p>	<p>Comment noted. Many homes across Newham are 'lovely but leaky' Victorian and Edwardian period homes. Newham is requesting funding from central government to help landlords, homeowners, housing associations and the Council's housing team to retrofit properties in Newham – to alleviate fuel poverty and the climate crisis.</p> <p>The Local Plan supports retrofit works to properties – noting that various retrofit works on houses can be undertaken without planning permission.</p>
Reg18-T-088	Resident	Reg18-T-088/023	Climate Emergency	CE4 Overheating						<p>[Change it] Also we need to spend sources for awareness programme, need to encourage through media, leaflets, whatsapp messages, emails, through GP, nursing home, care homes, libraries regarding how to protect hot weather, dehydration, to wear lose or light colour clothes etc etc</p>	<p>The Local Plan addresses this topic in the Climate Emergency policies. However, it cannot deliver the change you have requested. Our colleagues in the Climate Action department are able to help. We have also provided them with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/035	Climate Emergency	CE4 Overheating					<p>Part 3 Overheating - Clarification</p> <p>Section 1. of draft new policy CE4 introduces the requirement for all schemes to submit the Good Homes Alliance 'Early Stage Overheating Risk Tool' to Newham at early design stages. Also, if a score &gt;8 is reported then dynamic thermal overheating modelling should be carried out. The consented scheme has not completed the 'Early Stage Overheating Risk Tool' but dynamic thermal modelling has already been carried out to demonstrate compliance against CIBSE TM59.</p> <p>Section 3. of the draft new policy CE4 introduces the requirement for relevant buildings to meet compliance with Building Regulations Part O. The current overheating strategy of the consented scheme goes some way to meeting this requirement with some notable exceptions including the use of internal blinds and detailed consideration of local acoustic and air quality conditions.</p> <p>SHL recognise that the development will need to comply with Approved Document Part O from a building regulations compliance perspective, irrespective of Newham Local Plan policy decisions.</p> <p>Recommendation</p>	Comment noted. Planning applications are determined against the current Development Plan. Reserved matters and other changes to developments would be considered against the outline planning permission, any new policies can only over-ride on matters which have not already been established in principle by the outline permission.	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										<p>SHL suggests that:</p> <ul style="list-style-type: none"> <li>• LBN clarifies in the supporting text relating to policy that the policy requirements only relate to the determination of planning applications moving forwards and that the policy requirements will not be retrospectively applied to consented / legacy schemes (or flexibility given at the very least).</li> </ul>	
Reg18-E-136	St William Homes LLP and Berkeley South East	Reg18-E-136/153	Climate Emergency	CE4 Overheating						[The Berkeley Group supports the principle of...] reducing the risk of overheating wherever possible.	Support noted.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
	London Limited										
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/157	Climate Emergency	CE4 Overheating			2			Finally, Policy CE4 (point 2) should not preclude active cooling if it is the only method of mitigating overheating. This might often be the case where developments are trying to meet other policy objectives such as private amenity provision and building regulations. Proposed policy wording change: 2. Developments should mitigate overheating using 'passive design' principles <del>as a priority, rather than using 'active cooling' such as air conditioning.</del>	This wording change has not been made. However, the policy has changed to allow active cooling in situations where agent of change requires it. Please see the new wording in Implementation CE4.2 Overheating.
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/081	Climate Emergency	CE4 Overheating						CE8 overheating - support. Crazy warm last summer	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/096	Climate Emergency	CE4 Overheating			CE4.3			[Appendix A] The benefit of the inclusion of Criterion 3 is queried, given compliance with Part O is required to be demonstrated at Building Control stage. A qualitative assessment of overheating measures may be a more useful exercise.	A wording change has not been made. Given that passive design principles (i.e. building orientation, unit layout) etc. are significantly harder to retrofit, overheating needs to be considered at the earliest possible stages of design, so these 'passive design' principles can be incorporated.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/140	Climate Emergency	CE5 Retrofit and circular economy				CE 5.3		P.247 CE5.3 Comment: We ask that permission for retrofit work not be granted when evidence is not provided to show that there will be a sufficient reduction in energy use, that existing fossil fuel based energy will be replaced with green energy wherever possible (including the impact of accounting for the embodied carbon from installing new green energy systems over the next few years of the buildings operational use).	The wording change has not been made. Many retrofit actions can occur without requiring planning permission. The Council cannot decide the energy use that future occupants use.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/013	Climate Emergency	CE5 Retrofit and circular economy						<p>Newham Climate change topic paper 4 and Draft local plan climate change policy CE5– retrofit</p> <p>I have retrofitted my own home with a solar photovoltaic roof – this was a lot of money and I want to think it was worth it. One of my biggest worries is what would happen if my next door neighbour built a loft extension – the shadow would cover my roof and render it useless. So I am alarmed to see the retrofit section topic paper encouraging more relaxed planning about loft extensions. On the contrary, if homeowners who can just about afford it are to take up the big expense of installing a solar photovoltaic roof, they need to be reassured that Newham council would help them protect it via the planning system, by not allowing building that would render the solar roof useless. Rather than relax the laws about roof heights and loft extensions, the planning system must tighten up to ensure that solar photovoltaic roofs remain functioning. Given that the purpose of the climate change section is to change buildings to net-zero carbon, and that the Newham Local plan quite rightly emphasises the priority of the climate emergency, I think it is reasonable to ask Newham planning policy to protect existing solar photovoltaic roofs, as well as reassure those who are thinking about it. I am</p>	The Local Plan addresses this topic through Policy CE5 Retrofit and Circular Economy. Overshadowing and loss of daylight/sunlight would be a material planning consideration if your neighbour(s) submitted a planning application.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										glad to see that the bit about allowing bigger lofts hasn't made it to the draft plan – hopefully, unless I didn't notice it – but I think it is important that the policy goes further than that, by not allowing development that will render neighbours solar roofs useless.	
Reg18-E-027	Resident	Reg18-E-027/014	Climate Emergency	CE5 Retrofit and circular economy						Retrofit monitoring – it would be helpful if this could be monitored, but it is hard to see how. As you rightly say, most retrofit doesn't require planning permission – and we need to keep it that way, so as to not discourage. Newham council has no record of my own solar PV retrofit, for example.	Comment noted. Many retrofit actions can take place without needing planning permission, so it is very difficult to monitor when retrofit has taken place.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/015	Climate Emergency	CE5 Retrofit and circular economy						<p>Energy-intensity – evidence base and draft plan policies</p> <p>I agree with the emphasis put on ensuring that the buildings are heat-efficient, both for new buildings and retrofit. But I do have some concerns about insulation and draft-proofing, which I think are alluded to in either the evidence base or the draft policy. Firstly, surely making it harder for heat to escape makes it harder for moisture to escape, doesn't it? Doesn't this risk making mould worse? Having said that, I dry all my washing in my living room in the winter, which is the warmest room but the least-ventilated, and I don't get any mould in here. I do however get mould in the colder rooms that have external walls, even though one of them is a dining room that doesn't get any moisture and I keep it well-ventilated</p>	<p>Comment noted. We acknowledge that this has historically been a problem, in recent years building regulations have been updated to ensure that new homes are well ventilated. We would also support comprehensive consideration of retrofit to avoid any unforeseen issues from moisture as a result of additional insulation.</p>
Reg18-T-069	Resident	Reg18-T-069/028	Climate Emergency	CE5 Retrofit and circular economy						<p>[Add to it] Instead of so many shops luring people to buy new goods, some that they didn't even know they wanted, more second hand, upcycled, charity and repair shops encouraged to the borough, more renewables in every sense of the word.</p>	<p>The Local Plan addresses this topic in the Climate Emergency policies. However, it cannot deliver the change you have requested as we cannot specify the types of shops provided on high streets. Our colleagues in the Climate Action department are able to help. We have also provided them with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-091	Resident	Reg18-T-091/001	Climate Emergency	CE5 Retrofit and circular economy						[Add to it] there are several references to encouraging and enabling retrofit but there are gaps. There are no references to householders like us who wish to carry out for example external wall insulation. We have been told this may require PP (or a Cert of lawfulness) as it changes the external appearance of the dwelling away from Victorian brickwork to render finishes. Newham needs to ease its requirements on householders to produce a drawing of the proposed finish and how it abuts neighbours. There is also the questions of fees for PP or a Cert. There need to be simple, concrete measures to encourage householders to retrofit. This high level document uses words like 'encourage, enable, support' without really changing anything for individual householders responding to the climate emergency. Neighbouring boroughs like W Forest have simplified requirements.	Comment noted. The Local Plan addresses this topic through Policy CE5 Retrofit and Circular Economy. Many improvements to existing properties can be implemented without needed planning permission, and the Local Plan encourages retrofit works to existing properties. LB Newham does not set the level of fees for planning applications, these are set nationally.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/036	Climate Emergency	CE5 Retrofit and circular economy						<p>CE5 Retrofit and Circular Economy - Clarification</p> <p>This policy is an entirely new addition to the Local Plan. It is anticipated that many of the requirements and recommendations will either not have been accounted for within the current design of the approved scheme or will not be applicable. No retrofit or reuse of existing buildings and structures is included in the design of the consented scheme so it is anticipated that the creation of a Retrofit Plan is not required. Recommendation</p> <p>SHL suggests that:</p> <ul style="list-style-type: none"> <li>• LBN clarifies in the supporting text relating to policy that the policy requirements only relate to the determination of planning applications moving forwards and that the policy requirements will not be retrospectively applied to consented / legacy schemes (or flexibility given at the very least).</li> </ul>	Comment noted. Planning applications are determined against the current Development Plan. Reserved matters and other changes to developments would be considered against the outline planning permission, any new policies can only over-ride on matters which have not already been established in principle by the outline permission.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/141	Climate Emergency	CE6 Air quality					CE6.2 P.250 CE6 Air quality – Implementation, CE6.2 ‘Physical and green buffers can improve local air quality locally.’ Comment: We would suggest the use of the dense planting technique, Miyawaki to maximise the reduction in pollutants (and all-crucial carbon drawdown) where developments meet high traffic areas.	<p>The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council’s Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves ‘air quality neutral’.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>	



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/142	Climate Emergency	CE6 Air quality						<p>Could there be a planning requirement to introduce Miyawaki in these areas? It can also be quite beautiful (which could be of benefit to developers). See the Central London example below:  <a href="https://www.sugiproject.com/partnerships">https://www.sugiproject.com/partnerships</a>  <a href="https://www.sugiproject.com/partnerships/barking-and-dagenham">https://www.sugiproject.com/partnerships/barking-and-dagenham</a></p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding planting requirements, is not provided in the Local Plan. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/143	Climate Emergency	CE6 Air quality						<p>If not Miyawaki, then as part of gaining planning permission could developers be required to show a dense tree and bush/shrub planting plan, whereby they comply with what can be new Newham Council pre-determined requirements for a certain density of planting and eventual height of trees/plants to be used? This could in part be around air quality.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding planting requirements, is not provided in the Local Plan. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/144	Climate Emergency	CE6 Air quality						<p>However, as a group we would very much like to see a requirement for developers on all projects (irrespective of local traffic and pollution) to be required to plant a certain number of trees (chosen for being capable of locking up a good amount of CO2 quickly), bushes, shrubs, and self-seeding wildflowers for pollinators. We would hope that all plants will be diverse and help with biodiversity, including berries for birds etc</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding planting requirements, is not provided in the Local Plan. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/145	Climate Emergency	CE6 Air quality						Having a radical policy on planting requirements by developers could be really exciting and trendsetting. This could have a very positive impact on other Councils.	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the planting requirements, is not provided in the Local Plan. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and though working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/146	Climate Emergency	CE6 Air quality						Newham could be the Council to follow, if developers could be required to follow very specific regulations and even perhaps particular formulars...on density of planting (allowing for sufficient air space around plants to avoid the risk of mildew and fungal plant diseases...Sugi could help with this), carbon drawdown, spacing between areas of plantings, number of different species of plants (chosen for compatibility and suitable to be wellmanaged), percentage of land used for trees, bushes and plants, total numbers of, density, spacings and seasonal pollen/food availability coverage for pollinators, beneficial insects, birds etc.	A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the design of biodiverse infrastructure, is not provided in the Local Plan. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and though working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/147	Climate Emergency	CE6 Air quality			CE6.6			<p>P.251 CE6.6 Comment: Can developers be required to create 'green barriers' on balconies, as part of air quality mitigation practices and planning permission, and can these be required to include woody shrubs for pollinators and beneficial insects? Clearly the developers will not want to block out solar gains through patio doors. However, having small shrubs at the bottom of balconies could help to remove particulate matter, as it rises in the air.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as this level of detail, regarding the greening of balconies, is not provided in the Local Plan. However, it should be noted that Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough. The Strategy was devised through consultation with residents and through working across Newham's departments with responsibility for green and water space and the health and wellbeing of our communities. This means it is far reaching and as a consequence some of the actions in the Strategy, such as tree planting outside of a site allocation, extend beyond the scope of planning. The Strategy will be published alongside the Local Plan Regulation 19 consultation.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/226	Climate Emergency	CE6 Air quality						Non-diesel-powered equipment used by contractors for cutting branches, leaf blowing...	This wording change has been made. Please see the wording in Policy CE6 that encourages zero carbon alternatives to power NRMM and other construction equipment on site
Reg18-E-145	Environment Agency	Reg18-E-145/142	Climate Emergency	CE6 Air quality						The whole borough is an Air Quality Management Area (AQMA) and therefore we are very supportive this strong policy and the requirement for all development to mitigate and improve Newham's poor air quality.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/143	Climate Emergency	CE6 Air quality						We are also pleased to see reference made to Air Quality Positive and Air Quality Neutral approaches, in line with London Plan Policy S11 and the latest London Plan guidance.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/144	Climate Emergency	CE6 Air quality						We agree that the policy supports the delivery of measures identified in the Newham Air Quality Action Plan (AQAP).	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/145	Climate Emergency	CE6 Air quality						We encourage consideration to be given to how an air quality positive approach can be linked to other policies within the Plan.	Comment noted.
Reg18-E-145	Environment Agency	Reg18-E-145/146	Climate Emergency	CE6 Air quality					CE6.2	We are pleased to see the connection is made between green infrastructure / green buffers and the improvement of local air quality in implementation section CE6.2. As well as green corridors along transport corridors and new cycling and walking infrastructure being identified as an opportunity to help improve air quality.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/177	Climate Emergency	CE6 Air quality					CE6.2	In reference to implementation section CE6.2, we are pleased to see that Nature Based Solutions (NbS) and the concept of a 'green buffer' are identified as a measures to help reduce air pollution and improve air quality.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/178	Climate Emergency	CE6 Air quality						NbS can help build resilience to a number of climate impacts, such as flooding, drought and overheating. They also support commitments to achieving net zero carbon as NbS can provide natural carbon sinks and sequester carbon	Comment noted.
Reg18-E-145	Environment Agency	Reg18-E-145/179	Climate Emergency	CE6 Air quality						We strongly encourage the Local Plan promotes the uptake of NbS across the various climate emergency policies, where applicable	This wording change has been made. Please see the new wording in CE6.
Reg18-E-145	Environment Agency	Reg18-E-145/180	Climate Emergency	CE6 Air quality						We recommend the use of a Natural Capital approach to help prioritise the use of NbS within the Local Plan	This wording change has been made. Please see the new wording in CE6.
Reg18-E-145	Environment Agency	Reg18-E-145/181	Climate Emergency	CE6 Air quality						Furthermore, biodiversity net gain targets could also be linked to policies designed to create resilient places.	This wording change has not been made. We did not consider this change to be appropriate as biodiversity net gain is best considered in the Green and Water Space policies.
Reg18-E-033	Port of London Authority	Reg18-E-033/028	Climate Emergency	CE6 Air quality						Part 5 of policy CE6 includes a requirement that new moorings on waterways must include an electrical hook up at each mooring point. Whilst this is in principle supported further detail is needed in the supporting text on all types of moorings (Residential /	A wording change has been made, clarifying that the electrical hook ups at moorings are for houseboats. Please see the new wording in CE6.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Visitor / Commercial) that this would be a requirement for	
Reg18-E-027	Resident	Reg18-E-027/041	Climate Emergency	CE6 Air quality						<p>BUT does this 15 minute walk make me healthier? No it doesn't. In all directions, this 15 minute neighbourhood is major roads, packed with cars most of the time. I don't just mean that I live on a major road. Even when I turn off of it, to reach anything in any direction, I have to go on another major road. The Local Plan doesn't seem to address this at all.</p>	<p>The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/042	Climate Emergency	CE6 Air quality						<p>As well as meaning that I am exposed to air pollution every day, it also means that all these vehicles are pumping out CO2 emissions all the time. (I think this is even true of vehicles that comply with 'low emissions' for ULEZ – I think that ULEZ helped a lot in reducing toxic air pollution that harms health but didn't help much with CO2 emissions, but I'm not sure, I may be wrong.)</p> <p>What will Newham do about this?</p>	<p>The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council's Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves 'air quality neutral'.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>
Reg18-E-002	Resident	Reg18-E-002/003	Climate Emergency	CE6 Air quality						Also, if Newham's pollution causes the most deaths in the country, drastic	Comment noted. Any application would have to comply with the air quality policies.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										measures should be taken 'Why put polluters above people's health?	
Reg18-E-002	Resident	Reg18-E-002/004	Climate Emergency	CE6 Air quality						There are many major roads and highways in the borough and hgv lorries (eg the logipark). Measures should be taken immediately for all ages of people. What is more important - the wellbeing of all or the wellbeing of big businesses bank balances?	Comment noted. Any application would have to comply with the air quality policies.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-002	Resident	Reg18-E-002/024	Climate Emergency	CE6 Air quality						The noise pollution from air traffic must also be considered as well as the fallout from it in air pollution	<p>The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council’s Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves ‘air quality neutral’.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>
Reg18-E-002	Resident	Reg18-E-002/028	Climate Emergency	CE6 Air quality						Many of the measures above will help people to be more healthy and prevent	Support noted.

<b>Comment Response</b>	
<b>Comment</b>	much illness: eliminating the noise and air and water pollution
<b>Implementation</b>	
<b>Justification</b>	
<b>Clause</b>	
<b>Introduction</b>	
<b>Site allocation</b>	
<b>Policy</b>	
<b>Chapter</b>	
<b>Comment Reference</b>	
<b>Representor</b>	
<b>Representation Reference</b>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/074	Climate Emergency	CE6 Air quality						<p>[Change it] Air quality in Newham is a huge problem and I'd like the Local Plan to be even bolder on actions to improve it.</p>	<p>The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council's Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves 'air quality neutral'.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-011	Resident	Reg18-T-011/022	Climate Emergency	CE6 Air quality						[Add to it] I think where applicable any new developments should ensure a certain ratio of bicycle parking space to the number of dwellings (if this doesn't exist already).	The Local Plan addresses this topic through the Transport policies, which ensures adequate cycling parking in new development.
Reg18-T-011	Resident	Reg18-T-011/023	Climate Emergency	CE6 Air quality						[Add to it] I think if any parking bays are designed into a development they should be for electric vehicles and have access to charging points.	The Local Plan addresses this topic through the Transport policies, which ensure that electric vehicle charging points are provided when parking is delivered as part of development.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-011	Resident	Reg18-T-011/024	Climate Emergency	CE6 Air quality						[Add to it] I also think new developments should not be built within a certain distance of businesses which emit the highest levels of pollution in the borough.	<p>Comment noted. The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council’s Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves ‘air quality neutral’.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-031	Resident	Reg18-T-031/004	Climate Emergency	CE6 Air quality						The council of Newham should stand stronger against the selfish car-lobby who apparently don't understand the reason of the great measurements such as quieter neighborhoods and extention of ulez zones. Newham would not contribute to the national and international agreed requirements for a safer and healthier environment and even more people will die.	Comment noted. The Climate Emergency and Transport policies consider and promote these, to improve Newham's environment.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/029	Climate Emergency	CE6 Air quality						[Add to it] Welcome are any policies that help with air pollution.	<p>Support noted. The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council’s Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves ‘air quality neutral’.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/030	Climate Emergency	CE6 Air quality						[Add to it] I would love to see the ULEZ zone expand to Newham. Or at least as many places as possible expanded to non fuel vehicles and pedestrians only.	Comment noted. ULEZ was expanded to Newham in 2021.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/031	Climate Emergency	CE6 Air quality						<p>[Add to it] A major air pollutant is air traffic. One can stand in even a small open space and count 8 planes at any one time, and that doesn't take into account the ones not visible behind the trees and buildings... but the air pollution raining down on us all the time, on our bodies, our children, our vegetables in the garden or in the markets. At last we know what a killer the pollution in the air is. It has been hard for those that have seen it for decades and been derided. What exactly is being done about the flights that go over us? We have city airport, stanstead airport, southend airport AND the main culprit Heathrow airport. Their flights turn around here over us in the Stratford, Plaistow and other local areas (as well as all those others beyond Newham) for take off and landing 70% of the time! (I was told by them). This needs serious action and I don't believe it is happening. There are many other things I would like to say on this topic and the other topics that I just don't have the time for.</p>	<p>Comment noted. The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system. The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning. The Council's Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves 'air quality neutral'. Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/032	Climate Emergency	CE6 Air quality						[Add to it] The noise pollution is bad enough, more so now since more flights are allowed in the night,	<p>Comment noted. The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council’s Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves ‘air quality neutral’.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/033	Climate Emergency	CE6 Air quality						<p>[Add to it] I have gone into some detail in the green spaces section on the fact, that as we all know, everything is connected and feeds into and out of everything else. I implore the council to do more for the ever closing in climate crisis.</p>	<p>Comment noted. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p>In December 2023, Newham Council became the first local authority in the country to launch a Climate Action Just Transition Plan. It provides a blueprint to address the unequal impacts of climate change on Newham’s residents who are disproportionality impacted by the climate emergency, but pay the highest costs for climate adaptation.</p> <p>Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/034	Climate Emergency	CE6 Air quality						<p>[Add to it] Much emphasis is given to antisocial behaviour like fly tipping but that is unlikely to stop overnight by putting some planters in the area or similar efforts. We need to come to terms to live in a less consumer society, that everything we do matters, that the food we eat affects our behaviour and mental health, that we can't keep on extracting from the environment, throwing things away and buying new ones, exterminating our natural environments, having large families and expecting others and the planet to pick up the bill (and a lot more), always wanting more and better and bigger. We are possibly on the brink of making ourselves extinct. I would say plough in a large percentage of resources to planning for the worst case scenarios that we are likely to face, and even those that don't seem so likely. Educate people like was done in wartimes, focus attention on the dangers of tipping points, what could happen, preparedness as a community, nation, world. We could avert it if the emphasis was on it instead of so much other nonsense. Please Newham council, step up more on these issues, educate people more, in a reality check way, not for popularity.</p>	<p>Comment noted. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p>In December 2023, Newham Council became the first local authority in the country to launch a Climate Action Just Transition Plan. It provides a blueprint to address the unequal impacts of climate change on Newham's residents who are disproportionality impacted by the climate emergency, but pay the highest costs for climate adaptation.</p> <p>Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-069	Resident	Reg18-T-069/035	Climate Emergency	CE6 Air quality						<p>[Add to it] Building all those proposed new homes sounds lovely but there will still be a housing problem, people will flock here, will have more children, will want more goods, will have more waste etc etc etc etc. I feel really strongly about the climate crisis. It's not the time to ignore, nor to feel overwhelm and give up. It needs a concerted effort, for us, for other beings and nature, for the future. I just don't feel there's enough emphasis</p>	<p>Comment noted. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p>In December 2023, Newham Council became the first local authority in the country to launch a Climate Action Just Transition Plan. It provides a blueprint to address the unequal impacts of climate change on Newham's residents who are disproportionality impacted by the climate emergency, but pay the highest costs for climate adaptation.</p> <p>Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.</p>



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-071	Resident	Reg18-T-071/012	Climate Emergency	CE6 Air quality						[Keep it] Taking more steps to improve air quality by ensuring the every household knows what they can do to help.	The Local Plan addresses this topic in the Climate Emergency policies. However, it cannot deliver the change you have requested. Our colleagues in the Climate Action department are able to help. We have also provided them with your comments.
Reg18-T-114	Resident	Reg18-T-114/004	Climate Emergency	CE6 Air quality						[Keep it]	Support noted.
Reg18-E-054	University College London	Reg18-E-054/014	Climate Emergency	CE6 Air quality						UCL East is also supportive of design solutions to combat Newham's identified poor air quality, in alignment with draft Policy CE6. Throughout all stages of the development of UCL East, UCL has been committed to monitoring and minimising dust and other emissions arising from construction.	Comment noted.
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/019	Climate Emergency	CE7 Managing flood risk						Policy CE7: Managing Flood Risk and Policies Map Our client supports the aspirations and objectives of Policy CE7 to avoid placing people and essential infrastructure at increased risk of flooding which has been a central principle of the hybrid planning application.	Support noted.
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/020	Climate Emergency	CE7 Managing flood risk			3			Part 3 of Policy CE7 outlines that development needs to be set back a minimum of 16m from tidal flood defences and 8m from river defences, whilst taking into account the	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										requirements set out in the Thames Estuary2100 (and any subsequent updates).	
Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/021	Climate Emergency	CE7 Managing flood risk			4			Part 4 of Policy CE7 also notes that development adjacent to flood defences must confirm through liaison with the Environment Agency, that defence structures are in good condition and will provide protection for the lifetime of the development including taking into consideration the latest Climate Change Allowance modelling, and, where applicable, meet the provisions set out in the TE2100 (and any subsequent updates).	Comment noted.

Reg18-E-049	Albert Island Regeneration Limited	Reg18-E-049/022	Climate Emergency	CE7 Managing flood risk					<p>7.3 and 7.4</p> <p>Supporting implementation section for CE7.3 and CE7.4 crucially notes that the TE2100 Flood defence (set-back) buffering line is indicative only and applicants are responsible for investigating the status and nature of flood defences in consultation with the Environment Agency at the earliest stage.</p> <p>The hybrid planning application process has involved extensive discussions with the Environment Agency, including pre-application consultation, where it was noted as part of their consultation response that they are “confident that the flood defence strategy and its addendum sets out an approach to ensure that the development will be protected from flooding for its lifetime and that it will not cause flooding elsewhere”. The approved development will be appropriately protected from tidal flooding in the long-term with the raising of flood defences to the TE2100 levels of 8.80m AOD.</p> <p>The hybrid planning permission will provide improvements to the existing tidal flood defences and is supported by the Environment Agency. Agreement has also been reached with the Environment Agency about the positioning of buildings along the Thames and appropriate setbacks.</p> <p>The draft Policies Map provides a broad TE2100 Flood Defence Safeguarding Area which extends along the eastern boundary of the site. We have prepared an overlay of this safeguarding area on the Albert Island masterplan proposals (see enclosed drawing ref: 1621- SK416) and note that a significant part of the site</p>	<p>A change to the policy map has not been made. The TE2100 Flood Defence Safeguarding Area is a layer produced by the Environment Agency to support delivery of the TE2100 Plan. It is there to advise applicants on potential constraints. Through engagement with the Environment Agency during the planning process, site and scheme specific approaches to flood defences can be agreed. However, should this scheme not come forward, the scheme specific approach agreed with the EA may not be appropriate for a future scheme.</p>
-------------	------------------------------------	-----------------	-------------------	-------------------------	--	--	--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

										<p>is covered by safeguarding and would not be deliverable if the Policies Map is to be used as a set-back informing future development decisions.</p> <p>Whilst we acknowledge that the supporting implementation text for CE7.3 and CE7.4 states that the set-back zone is indicative only, in light of the support the scheme has from the Environment Agency, it is requested that the Policies Map is updated to have regard to the separation distances of the buildings shown on the masterplan to the river edge to ensure that the scheme remains deliverable and to avoid potential future ambiguity regarding the agreed level of setback.</p> <p>It is evident that the EA have been satisfied that flood risk will be suitably managed and the raising of the flood defences provides a major beneficial effect by reducing the flood risk for the site and local area substantially.</p> <p>As such, it is considered that the TE2100 Flood Defence Safeguarding Area Policies Map should be amended to reflect the layout of the approved development proposals.</p>	
--	--	--	--	--	--	--	--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-050	Anchor	Reg18-E-050/035	Climate Emergency	CE7 Managing flood risk				CE 7. 2		Sequential and Exception Tests are required at plan preparation stage to identify appropriate allocation sites. Planning Practice Guidance confirms that Sequential and Exception Tests are not required with planning applications where the site has been allocated for development and subject to the test at the plan-making stage. The policy requirements should be updated to ensure they are consistent with national policy and that applicants with proposals on allocated sites are not required to carry out Sequential and Exception Tests.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy does not require proposals on allocated sites to carry out Sequential and Exception Tests. It requires schemes to pass them and refers to the SFRA. Therefore sites which have already passed these tests in the SFRA do not need to do so again.
Reg18-E-133	Climate You Change	Reg18-E-133/148	Climate Emergency	CE7 Managing flood risk			2			CE7 Managing flood risk '2. Developments within Flood Zones 2 (medium probability of flooding) and 3 (high probability), or where detailed more up to date modelling shows it will be at increased risk of flooding due to the impacts of the climate emergency, should:' Comments: We very much suggest adding - g. include flood tolerant trees, bushes/shrubs and other plants. These should be trees and plants capable of lessening the impact of surface flood water, ideally with deep roots (dependant on the proximity to buildings)	A change to this policy has not been made. We did not consider this change to be necessary as this requirement is part of GWS2: Water spaces. The wording of the supporting text of GWS2.2 has been updated to provide greater clarity and reference.
Reg18-E-145	Environment Agency	Reg18-E-145/147	Climate Emergency	CE7 Managing flood risk						We strongly support this comprehensive policy on managing flood risk across the borough. I	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/148	Climate Emergency	CE7 Managing flood risk			1a			In particular, we are pleased to see reference to Newham's Strategic Flood Risk Assessment (SFRA) (CE7.1.a)	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/149	Climate Emergency	CE7 Managing flood risk			1b			In particular, we are pleased to see ... and that the Local Plan supports the sequential approach, ensuring development is located in areas with the lowest probability of flooding (CE7.1.b).	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/150	Climate Emergency	CE7 Managing flood risk			1c			We support the policy's requirement for development to avoid and reduced flood from all sources (CE7.1.c)	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/151	Climate Emergency	CE7 Managing flood risk			1d			are pleased to see that the Environment Agency are referenced in connection the adequacy of Flood Risk Assessments (FRAs) (CE7.1.d.).	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/152	Climate Emergency	CE7 Managing flood risk			1a			We would like to see stronger wording in the Local Plan to demonstrate the Council's commitment to managing flood risk, in order to ensure that the requirements of the NPPF and Planning Practice Guidance are adhered to, so that development remains safe for its lifetime and does not increase flood risk elsewhere. Developers will need to demonstrate that any new developments will be safe for their lifetime without increasing flood risk elsewhere, by assessing flood risk, residual risk, and safe access and egress.	Comment noted. The specific changes requested have been made to strengthen the policy.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/153	Climate Emergency	CE7 Managing flood risk			2f			Policy requirement CE7.2.f mentions the provision of safe access / egress. Safe access and egress should be provided for all developments, not just residential developments that increase the net number of units. This should be to an area outside the floodplain, or to safe havens on higher floors if not possible	This policy wording has now changed to add reference to safe havens on higher floors. Please see the new wording in CE7.2f. No further change has been made as the policy does not limit the requirement to residential developments that increase the net number of units.
Reg18-E-145	Environment Agency	Reg18-E-145/154	Climate Emergency	CE7 Managing flood risk			3			Policy requirement CE7.3 states that development “will be set back a minimum of 16 metres from tidal flood defences and eight metres river defences to future proof against increased risks of fluvial flooding...”. We recommend that it is amended to clarify that development ‘will be set back a minimum of 16 metres from the landward side of tidal flood defences and eight metres from the landward side of river defences to...’.	This policy wording has now changed to provide this clarification. Please see the new wording in CE7.3.
Reg18-E-145	Environment Agency	Reg18-E-145/155	Climate Emergency	CE7 Managing flood risk			3	CE 7.3		Additionally, the policy requirement for development setbacks from tidal defences should be improved to clarify this relates all defence structures, including underground components such as tie rods and ground anchors which may protrude into the site. If present, a 16 metre set back will need to be sought.	The wording in the implementation text for CE7.3 has now changed to provide this clarification.
Reg18-E-145	Environment Agency	Reg18-E-145/156	Climate Emergency	CE7 Managing flood risk			4			The wording of policy requirement CE7.4 should be strengthened by adding that for residential developments a lifetime of at least 100 years is required, and 75 years for commercial developments.	The wording in the implementation text for CE7.4 has now changed to provide this clarification.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										With respect to the timing of these improvements, rather than stating at the earliest opportunity, we recommend the policy insists these improvements are complemented prior to development.	
Reg18-E-145	Environment Agency	Reg18-E-145/157	Climate Emergency	CE7 Managing flood risk			5.b			We are very pleased to see that CE7.5.b. requires proposals in the named neighbourhood areas need to have regard to emerging Riverside Strategy.	Support noted. However, reference to the Riverside Strategy has now been removed as the Environment Agency and Royal Docks Team have unfortunately not had sufficient resource to progress this piece of work at this time.
Reg18-E-145	Environment Agency	Reg18-E-145/158	Climate Emergency	CE7 Managing flood risk			4			We advise that policy includes specific requirements for development along the tidal riverside to Maintain, enhance, or replace flood defence walls, banks, and flood control structures to provide adequate protection for the lifetime of the development, including ensuring adequate provision of space for this in regeneration or Local Plan site allocations	A change to this policy approach has not been made. We did not consider this change to be necessary as this is sufficiently addressed in policy CE7.4.
Reg18-E-145	Environment Agency	Reg18-E-145/159	Climate Emergency	CE7 Managing flood risk			4			We advise that policy includes specific requirements for development along the tidal riverside to: Demonstrate how the tidal flood defences can be upgraded to the required Thames Estuary 2100 levels in the future through submission of plans and cross-section of the proposed raising. Where opportunities exist, this could be achieved through developers raising defences now to the require	A change to this policy approach has not been made. We did not consider this change to be necessary as this is sufficiently addressed in policy CE7.4.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										heights, as long as these are able to be adapted if required in future.	
Reg18-E-145	Environment Agency	Reg18-E-145/160	Climate Emergency	CE7 Managing flood risk			4			We advise that policy includes specific requirements for development along the tidal riverside to: Demonstrate the provision of improved access to existing defences, or where opportunities exist, to realign or set back defences.	The wording in the implementation text for CE7.3 has been changed to highlight the need for improving access to existing defences.
Reg18-E-145	Environment Agency	Reg18-E-145/161	Climate Emergency	CE7 Managing flood risk			4			We advise that policy includes specific requirements for development along the tidal riverside to: Provide associated landscape, amenity and habitat improvements alongside defence improvements where appropriate, in line with the riverside strategy approach.	A change to this policy has not been made. We did not consider this change to be necessary as this requirement is part of GWS2: Water spaces. The wording of GWS2.2 has been updated to provide greater clarity.
Reg18-E-145	Environment Agency	Reg18-E-145/162	Climate Emergency	CE7 Managing flood risk			4			We advise that policy includes specific requirements for development along the tidal riverside to: Safeguard and protect land for future defence raising and possible modification to the existing Thames Barrier.	The wording in the implementation text for CE7.4 has been changed to reference King George V Flood Gate and the Thames Barrier and the need to ensure development does not impact on future upgrades to these defences.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/163	Climate Emergency	CE7 Managing flood risk			4			We advise that policy includes specific requirements for development along the tidal riverside to: Secure financial contributions from partners in order to enable flood defence works.	A change to this policy approach has not been made. The ability to seek such contributions is already addressed under 'Planning Obligation'.
Reg18-E-145	Environment Agency	Reg18-E-145/164	Climate Emergency	CE7 Managing flood risk						Policy CE7 needs to be amended to specifically acknowledge the presence and importance of the Thames Barrier.	The wording in the implementation text for CE7.4 has been changed to reference King George V Flood Gate and the Thames Barrier and the need to ensure development does not impact on future upgrades to these defences.
Reg18-E-145	Environment Agency	Reg18-E-145/165	Climate Emergency	CE7 Managing flood risk			4			The TE2100 Plan contains a number of high-level options to manage flood risk in London and the Estuary to the end of the century and beyond. One of these options is to modify the existing Thames Barrier, and if chosen, we want to ensure that no proposed developments or land uses, within the vicinity of the Thames Barrier site, prevent this modification from occurring. This should be reflected either in CE7.4 or as a new part CE7.6. within the policy.	The wording in the implementation text for CE7.4 has been changed to reference King George V Flood Gate and the Thames Barrier and the need to ensure development does not impact on future upgrades to these defences.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/166	Climate Emergency	CE7 Managing flood risk					CE7.1 We have the following recommendations to strengthen the implementation section for policy CE7.1., to better align with the requirements of the TE2100 Plan and to ensure development appropriately considers flood defence constraints and raising requirements. Please note, following the 10-year review of the TE2100 Plan, the deadline for upstream defence raising had been update to 2050, from 2065. The TE2100 Plan's requirements for Newham include future raising of all tidal flood defences, together with an ongoing programme of inspection, maintenance, repair, and replacement of defences as required. Corridors of land alongside the existing defences should be safeguarded to provide space for these works. As a local planning authority, you have a responsibility to maintain and raise any defences you own, as well as ensuring that proposed works to third party defences align with the requirements of the Plan. The future raising requirements of the flood defences levels in Newham are as follows: <ul style="list-style-type: none"> <li>• Raising of all defences along the Thames upstream of the Thames Barrier by up to 0.5m by 2050, and by an additional 0.5m by 2100.</li> <li>• Raising of defences on the River Lea (from Three Mills to the Thames) in 2050</li> </ul>	The wording in the implementation text for CE7.4 has been changed to include these flood defences raising requirements. This is the more appropriate location than the implementation text for CE7.1.	

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>and 2100 by up to 1m in total.</p> <ul style="list-style-type: none"> <li>• Raising of defences on the River Roding (from Ilford Bridge to Barking Barrier) in 2050 and 20100, by up to 1m in total.</li> <li>• If the decision is made to modify / improve the Thames Barrier rather than build a new barrier further downstream, it will be required to raise all defences downstream of the Thames Barrier by up to 1.1m by 2070, and by an additional 0.5m by 2100. The flood control gate on the King George V Dock would also require replacement.</li> </ul> <p>Note, this allows for projected increases in sea level to 2135 and beyond.</p>										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/168	Climate Emergency	CE7 Managing flood risk			7.1. b	3. 24 3		[Corrections] Please note, there is an error at CE7.1.b – it is the ‘Exception Test’, not ‘Exceptions Test’ (there is no ‘s’). The same correction is also required on for paragraph 3.243 on page 253.	This was an error and has now been corrected. Please see new wording in CE7.1. b and justification text.
Reg18-E-145	Environment Agency	Reg18-E-145/169	Climate Emergency	CE7 Managing flood risk			7.3 and 7.4			[Corrections] On page 252, a correction is required as the word ‘Plan’ is missing from the reference to the Thames Estuary 2100 Plan. This is in reference to CE7.3 (‘Thames Estuary 2100 Plan’) and CE7.4 (‘TE2100 Plan’). Secondly, please emit ‘(and any subsequent updates)’ following the mention of the TE2100 Plan.	The errors have been corrected and the name of the document has been amended to reflect your representation.
Reg18-E-145	Environment Agency	Reg18-E-145/170	Climate Emergency	CE7 Managing flood risk				Evidence base		[Corrections] In reference to the ‘Evidence base’ on page 255, the TE2100 Plan should be written as ‘Thames Estuary 2100 Plan (Environment Agency)’. Please leave out the 2012 to accommodate the updated Plan.	The name of the document has been amended to reflect your representation.
Reg18-E-145	Environment Agency	Reg18-E-145/204	Climate Emergency	CE7 Managing flood risk						It is important that Policy CE7 Managing flood risk is a strong policy and includes the additional points, raised above, regarding the flood defences and possible modification of the Thames barrier in the future.	Comment noted.
Reg18-E-044	Friends of West Ham Park	Reg18-E-044/014	Climate Emergency	CE7 Managing flood risk						[CE7] and CE8 - [As part of the Climate Emergency element of the Plan, these two policies focus on the implications of flooding and drainage. However, the predicted climate changes are also likely to increase periods of intense heating and drought].	Comment noted. Policies CE1: Environmental design and delivery and CE4 Overheating address heating and drought.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/036	Climate Emergency	CE7 Managing flood risk			5a			The Mayor welcomes that the draft plan recognises and references the emerging 'Integrated Water Management Strategy (IWMS)' and requires development proposals to consider the IWMS as supplementary guidance to the local plan policy.	support noted
Reg18-E-093	Greater London Authority	Reg18-E-093/037	Climate Emergency	CE7 Managing flood risk						To further align with the London Plan Policy SI 5(F) that requires that Development Plans be informed by IWMS at an early stage, the Mayor advises that the borough considers how the recommendations emerging from the IWMS can be implemented in policy, if appropriate, while the local plan progresses.	Further details regarding how developments within the Royal Docks and Beckton area should deliver the relevant site specific recommendations of the local IWMS have been included in the implementation text of CE7.5.
Reg18-E-033	Port of London Authority	Reg18-E-033/029	Climate Emergency	CE7 Managing flood risk			5b			Part 5b of policy CE7 refers to an emerging riverside strategy for the borough which will provide supplementary design guidance to ensure flood defence requirements are delivered to improve flood risk management and maximise multifunctional benefits including public access to the river and an improved riverside environment. It doesn't appear that this strategy yet forms part of the published evidence base for the Local Plan and the PLA requests to be consulted on the strategy when available.	Support noted. However, reference to the Riverside Strategy has now been removed as the Environment Agency and Royal Docks Team have unfortunately not had sufficient resource to progress this piece of work at this time.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-091	Resident	Reg18-E-091/021	Climate Emergency	CE7 Managing flood risk						Comment 5: Flooding Assessment (report in progress) - when looking at Newham's proposals map it is striking to see how much of the borough could be impacted by flooding in the future. And more concerning that much of the intensive development is also happening very close to the River Thames and the large tidal tributaries of the River Lea and Roding. If planning is still waiting on the results of the flood assessment, is there a potential that developed policies, proposals and site allocations may not be sustainable, given changes in climate and sea level rise?	Comment noted.
Reg18-E-092	Royal Docks	Reg18-E-092/027	Climate Emergency	CE7 Managing flood risk				CE 7.3 - 7.5		CE7 – subject to the Environment Agency's response to the Regulation 18 draft, we would suggest adding here a reference to the need, at some point, to replace the King George V Flood Gate at the eastern end of the Royal Docks.	The wording in the implementation text for CE7.4 has been changed to reference King George V Flood Gate and the need to ensure development does not impact on future upgrades.
Reg18-E-092	Royal Docks	Reg18-E-092/028	Climate Emergency	CE7 Managing flood risk			5			Policy CE7 'Flood Risk' also notes that proposals for various development sites should have regard to the emerging Riverside Strategy. The value and benefit of this work is supported; however, it is unclear whether Newham or the EA has progressed this. It is understood that the strategy would provide best practice guidance and/or supporting guidance to support riverside management in the Plan. Reference to the strategy should be removed until more detailed	Support noted. However, reference to the Riverside Strategy has now been removed as the Environment Agency and Royal Docks Team have unfortunately not had sufficient resource to progress this piece of work at this time.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										recommendations are brought forward, and the work has developed sufficiently to have material merit.	
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/029	Climate Emergency	CE7 Managing flood risk			3			<p>Stratford East recommends further flexibility is added to the policy to reflect for instance where there may not be an existing 8m distance from the top of the river bank to the nearest development.</p> <p>It is recommended that appropriate flexibility could be introduced by adding text explaining that developments within these minimum distances will be acceptable provided that the impact has been assessed in consultation with the relevant stakeholders, such as the Canal and Rivers Trust or the Environmental Agency and agreed to be acceptable.</p>	<p>This policy approach has now changed at the request of the Environment Agency who also require the set back wording to be included in the Plan. Flexibility is already provided through implementation text CE7.3 and CE7.4, which states that the buffering line is indicative only and that applicants should discuss requirements further with the Environment Agency. The current and draft policies are in keeping with national and regional policy.</p>



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/040	Climate Emergency	CE7 Managing flood risk			1b			In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".	Comment noted. The Strategic Flood Risk Assessment and sequential test considers flood risk from all sources, including flooding from sewers. Policy CE7 requires consideration of flooding from all sources. Implementation text CE7.1 confirms that this includes sewer overflow.
Reg18-E-028	Thames Water	Reg18-E-028/041	Climate Emergency	CE7 Managing flood risk			2			When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.	Comment noted. It is not considered any change is required to the policy to allow for upgrades to, or increases in, sewage treatment capacity.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/042	Climate Emergency	CE7 Managing flood risk				CE 7.1		Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.	Comment noted. The Strategic Flood Risk Assessment and sequential test considers flood risk from all sources, including flooding from sewers. Policy CE7 requires consideration of flooding from all sources. Implementation text CE7.1 confirms that this includes sewer overflow.
Reg18-E-050	Anchor	Reg18-E-050/036	Climate Emergency	CE8 Sustainable drainage			2			This policy should allow flexibility, for example in the requirements for rainwater storage for reuse and irrigation, to ensure that it is effective and does not compromise development viability.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy sets an overarching requirement for schemes to provide rainwater storage but the technology and scale used are flexible and varied, as outlined in the implementation text.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/149	Climate Emergency	CE8 Sustainable drainage					3.24 6	<p>P.257 CE8 Sustainable drainage - Justification - 3.246 'The policy actively promotes an integrated approach to water management from small-scale design considerations such as greening'. Comment Could greening be a strong, policy driven requirement of planning approval, rather than something which is promoted?</p> <p>Greening (and the right kind of greening which goes far enough with density of planting, root depth, heights of trees/bushes and sequestration on CO2, including how quickly the latter happens) is such a tremendously important consideration when it comes to removing CO2, mitigating, and adapting to flood risk, that we would really like to see a high bar set for developers into terms of their legal requirements here.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the prioritisation of green methods of providing sustainable drainage is embedded in the Sustainable Drainage Hierarchy which development is required to follow in policy CE8.4. Further greening requirements for new development are included in the Green and Water Space policies.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/151	Climate Emergency	CE8 Sustainable drainage			3		3.24 6	P.257 3.246 'All development presents opportunities to...increase the opportunities for permeable ground surfaces' Comment: Could it be mandatory to only use permeable surfaces or paving which has grass/gravel over soil (or other medium which allows water to filter through to soil) between the gaps or decking (FSC if wood and ideally heat-treated, using Shou Sugi Ban) which has narrow gaps between planks, alongside French drains?	A change to this policy approach has not been made. We did not consider this change to be appropriate because the suitability of proposed materials will need to consider a range of factors, including level of footfall and function of the space. Further guidance on the preferred design and materials for SuDS schemes is provided in the Newham Sustainable Drainage Design and Evaluation Guide <a href="https://www.newham.gov.uk/downloads/file/2364/suds-design-evaluation-guide-newham">https://www.newham.gov.uk/downloads/file/2364/suds-design-evaluation-guide-newham</a> and this is referenced in the policy.
Reg18-E-133	Climate You Change	Reg18-E-133/152	Climate Emergency	CE8 Sustainable drainage			3			Can it also be mandatory for planning approval to require developers to greatly limit the amount of 'covered' surfaces, against areas of in-ground greening? Could there be an upper limit of covered surfaces which is permissible?	This policy approach has now changed to reflect the recommendations of the Strategic Integrated Water Management Strategy for the Royal Docks and Beckton Opportunity Area. This highlighted the need for an opportunity to establish targets for Blue-green infrastructure run-off reduction interventions on site allocations in that part of the borough. Please see the new wording in policy CE8.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/171	Climate Emergency	CE8 Sustainable drainage						We support Policy CE8 and agree that it aligns with the London Plan and the NPPF.	support noted
Reg18-E-145	Environment Agency	Reg18-E-145/172	Climate Emergency	CE8 Sustainable drainage			2			In reference to policy requirement CE8.2., we strongly support the identification of the multifunctional benefits of Sustainable Drainage Systems (SuDs). Policy SI 13 of the London Plan states that 'Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.' Such approaches also help to minimise the carbon footprint associated with wastewater treatment and water supply, and provide adaptation benefits of reducing flood risk, ameliorate high temperatures and replenish water resources.	support noted

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/173	Climate Emergency	CE8 Sustainable drainage			5a			<p>Policy CE8 can be strengthened by referencing sustainable drainage in the context of groundwater protection. Given the previous uses of several proposed development sites, there is a risk of contamination that could be mobilised by surface water infiltration from SuDS which could pollute controlled waters. This is particularly concerning at locations within Source Protection Zones or upon principle or secondary aquifers, where groundwater is vulnerable. The use of infiltration SuDS must be demonstrated to be appropriate in a location to manage potential adverse impacts on groundwater and avoid unacceptable levels of water pollution. As mentioned in our response to the Issues and Options consultation, we strongly recommend the policy on drainage (Policy CE8) expands the discussion of SuDS solutions to discuss the need for an Environmental Permit for discharges of surface water run-off at sites where land is potentially contaminated. (See section G11 of the Environment Agency's The Environment Agency's approach to groundwater protection (<a href="http://publishing.service.gov.uk">publishing.service.gov.uk</a>)).</p>	This wording change has been made to provide further guidance on this issue. Please see the new wording in the implementation text for CE8.1 and CE8.2.
Reg18-E-145	Environment Agency	Reg18-E-145/182	Climate Emergency	CE8 Sustainable drainage					CE8.1 and CE8.2	[Correction] On page 257, in reference to the diagram entitled 'Four Pillars of Sustainable Urban Drainage System design defined by CIRIA: The SuDS Manual C753', the topic 'water quality' is	This was an error and has now been corrected. Please see the new wording in the diagram.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										written twice. The first 'water quality' segment should be corrected to read 'water quantity'	
Reg18-E-044	Friends of West Ham Park	Reg18-E-044/015	Climate Emergency	CE8 Sustainable drainage						CE7 and [CE8 - As part of the Climate Emergency element of the Plan, these two policies focus on the implications of flooding and drainage. However, the predicted climate changes are also likely to increase periods of intense heating and drought].	Comment noted. Policies CE1: Environmental design and delivery and CE4 Overheating address heating and drought.
Reg18-E-096	L&Q	Reg18-E-096/026	Climate Emergency	CE8 Sustainable drainage		4			[LBN has set ambitious targets through their climate change policies. Whilst we are supportive	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local and Strategic Integrated Water Management Strategies demonstrate the necessity and deliverability of greenfield run-off. See Section 2: Implementation toolkit. In addition policy CE8.5.c provides greater flexibility in the limited circumstances where it cannot be achieved. This policy wording has changed at the request of the Lead Local Flood Authority to provide greater clarity.	

<p><b>Comment Response</b></p>	
<p><b>Comment</b></p>	
<p><b>Implementation</b></p>	<p>e of this, we are concerned that some of the policies set targets that have not been fully tested to ensure they are deliverable across a</p>
<p><b>Justification</b></p>	
<p><b>Clause</b></p>	
<p><b>Introduction</b></p>	
<p><b>Site allocation</b></p>	
<p><b>Policy</b></p>	
<p><b>Chapter</b></p>	
<p><b>Comment Reference</b></p>	
<p><b>Representor</b></p>	
<p><b>Representation Reference</b></p>	



<p><b>Comment Response</b></p>	
<p><b>Comment</b></p>	
<p><b>Implementation</b></p>	<p>range of schemes (both in terms of type and sizes). This includes [...] and Policy CE8 where greenfield run-off rates are sought on Major</p>
<p><b>Justification</b></p>	
<p><b>Clause</b></p>	
<p><b>Introduction</b></p>	
<p><b>Site allocation</b></p>	
<p><b>Policy</b></p>	
<p><b>Chapter</b></p>	
<p><b>Comment Reference</b></p>	
<p><b>Representor</b></p>	
<p><b>Representation Reference</b></p>	

<p><b>Comment Response</b></p>	
<p><b>Comment</b></p>	
<p><b>Implementation</b></p>	<p>Developments. [Further evidence is required to demonstrate whether these targets are deliverable.]</p>
<p><b>Justification</b></p>	
<p><b>Clause</b></p>	
<p><b>Introduction</b></p>	
<p><b>Site allocation</b></p>	
<p><b>Policy</b></p>	
<p><b>Chapter</b></p>	
<p><b>Comment Reference</b></p>	
<p><b>Representor</b></p>	
<p><b>Representation Reference</b></p>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-071	Resident	Reg18-T-071/013	Waste and Utilities	CE8 Sustainable drainage			1			[Change it] Why does rain water from drain have to be mixed with human waste then we have to paid for them to be separated? [Originally submitted in response to W1]	Comment noted. This is as a result of our Victorian drainage system, which means most of London has a combined system where rain water, sewage and waste water are all combined and processed together. The purpose of policy CE8 is to divert rain water from needing to enter the combined sewage system and instead ideally be reused or slowly drain into the ground. This will reduce the energy requirements for processing waste, reduce costs and reduce sewer flooding.
Reg18-T-103	Resident	Reg18-T-103/026	Climate Emergency	CE8 Sustainable drainage						[Change it] Regular drainage and sewer issues in area	Comment noted.
Reg18-T-114	Resident	Reg18-T-114/005	Climate Emergency	CE8 Sustainable drainage						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/043	Climate Emergency	CE8 Sustainable drainage				3.244		With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.	Comment noted.
Reg18-E-028	Thames Water	Reg18-E-028/044	Climate Emergency	CE8 Sustainable drainage				3.244		SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/045	Climate Emergency	CE8 Sustainable drainage						With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: <u>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</u>	This wording change has been made. Please see the new wording in the implementation text for CE8.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-058	Resident	Reg18-T-058/022	Community Facilities	CF2 New and re-provided community facilities						<p>Firstly I am concerned about the Air pollution,</p>	<p>Comment noted. The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council’s Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves ‘air quality neutral’.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-074	Resident	Reg18-T-074/001	Design	D1 Design Standards						[Add to it] Older flat need to made to keep heat in when time cold	<p>The Local Plan addresses this topic through Policy CE5 Retrofit and Circular Economy. However, it cannot deliver the change you have requested, as the Local Plan cannot deliver improvements to existing buildings. Many homes across Newham are 'lovely but leaky' Victorian and Edwardian period homes. Newham is requesting funding from central government to help landlords, homeowners, housing associations and the Council's housing team to retrofit properties in Newham – to alleviate fuel poverty and the climate crisis.</p> <p>The Local Plan supports retrofit works to properties – noting that various retrofit works on houses can be undertaken without planning permission.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-074	Resident	Reg18-T-074/002	Design	D3 Design-led residential site capacity optimisation						[Add to it] Work to help to keep old flat warmer	<p>The Local Plan addresses this topic through Policy CE5 Retrofit and Circular Economy. However, it cannot deliver the change you have requested, as the Local Plan cannot deliver improvements to existing buildings. Many homes across Newham are 'lovely but leaky' Victorian and Edwardian period homes. Newham is requesting funding from central government to help landlords, homeowners, housing associations and the Council's housing team to retrofit properties in Newham – to alleviate fuel poverty and the climate crisis.</p> <p>The Local Plan supports retrofit works to properties – noting that various retrofit works on houses can be undertaken without planning permission.</p>
Reg18-T-074	Resident	Reg18-T-074/006	Homes	H3 Affordable housing						[Add to it] He'll to keep daughter out and heat in	<p>Unfortunately, it was not clear what change or addition you wanted to make to this part of the Plan. The Climate Emergency policies encourage energy efficiency in both new and existing homes.</p>



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/126	Climate Emergency	T2 Local transport						Policy T2 is welcomed and supported - places great emphasis on supporting delivery of walking and cycling strategies and supporting principles of 15 minute neighbourhoods.	Support noted.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/127	Climate Emergency	T2 Local transport						It will be important to ensure delivery of key infrastructure and connectivity projects identified within LLDC plans and these will be highlighted through our ongoing coordination work and consultation on the LLDC LPA Infrastructure List.	Comment noted.
Reg18-E-050	Anchor	Reg18-E-050/031	Climate Emergency							We would also question the costs referred to within the Etude report "Operational energy and carbon evidence base" and the Viability Assessment. The scenario on Page 74 of the Etude report appears to show a 28-unit development with a GIA of 2,125sqm (76sqm per apartment) with an average build cost of £160,000 per Part L compliant unit (£2,105/sqm), while the scenario on Page 73 shows a 7-unit development with a GIA of 641sqm (92sqm per apartment) with an average build cost of £160,000 per unit (£1,739sqm). In contrast, the Viability Assessment includes (at Table 4.12.1) identifies baseline costs of £2,048 and £2,440 per sqm before policy costs. Furthermore, paragraph 4.15 of the Viability Assessment goes on to apply a 3.1 – 3.7% uplift to medium-rise flatted developments for net zero yet fails to	Comment noted. The offset cost wasn't included, but these are modest 0.8% of build costs and 1.3% of build costs for taller buildings. These additional costs will be included in the updated Viability Assessment. It will demonstrate that the policies are achievable, deliverable and viable.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										also include the offset payment of £53,505 - £65,010 (£2,300 per unit) which the Etude report also states will be payable to achieve net zero policy compliance. Overall, we consider that the evidence base has not fully tested the effect of the proposed policies on development viability and therefore that the policies are not justified or effective.	
Reg18-E-050	Anchor	Reg18-E-050/033	Climate Emergency							We also have concerns about some of the cost assumptions within the Viability Assessment. Achieving embodied carbon limits of 500kgCO2/m2 won't, for example, cost the same as achieving net zero operational carbon emissions. There is no justification for reducing the London Plan threshold for preparing a WLC carbon emissions assessment. WLC carbon emissions assessments are at an early stage of evolution and subject to significant variability. Module D is also clearly speculative. Commuted sums should therefore not be payable for any shortfalls against an embodied carbon target at this time, as the calculation is based on speculative future uses of a	Comment noted. Evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little impact. The policy does not contain requirements regarding commuted sums.

<b>Comment Response</b>	
<b>Comment</b>	development and the methodology is evolving.
<b>Implementation</b>	
<b>Justification</b>	
<b>Clause</b>	
<b>Introduction</b>	
<b>Site allocation</b>	
<b>Policy</b>	
<b>Chapter</b>	
<b>Comment Reference</b>	
<b>Representor</b>	
<b>Representation Reference</b>	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/006	Climate Emergency							<p>There are many things that we as a group like about Newham Council's Draft Local Plan, as it addresses many factors pertaining to climate change. Clearly there has been a big push on sustainability.</p>	<p>Support noted. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p>In December 2023, Newham Council became the first local authority in the country to launch a Climate Action Just Transition Plan. It provides a blueprint to address the unequal impacts of climate change on Newham's residents who are disproportionality impacted by the climate emergency, but pay the highest costs for climate adaptation.</p> <p>Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/155	Climate Emergency							General feedback on the Climate Emergency Section, as it pertains to the granting or otherwise of developers seeking planning permission: One of our members who runs an architects practice pointed out that there is no legal requirement that she could see within Newham's Draft Local Plan for developers to be required to work to achieve certification across the pre-construction, construction and post-construction elements of buildings and developments	This wording change has not been made. Outside of the design policies, we do not mandate architects as part of the policy.
Reg18-E-133	Climate You Change	Reg18-E-133/156	Climate Emergency							According to her advice we would very much ask that Newham Council makes it mandatory for developers of all but the smallest of developments* [See Reg18-E-133/160] to require Breeam or Passive House certification.	This wording change has not been made. We did not consider this change to be necessary. However, the policy has changed to indicate that Passivhaus could be one of the assured performance methods. Please see the new wording in Policy CE2.
Reg18-E-133	Climate You Change	Reg18-E-133/157	Climate Emergency							Some London Boroughs and nationwide councils have Breeam embedded within their policies.	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/158	Climate Emergency							. Whilst we understand that Passive House certification applies such stringent standards of compliance as to be unachievable for some developers, we recognise that if developers have to at least comply with Breeam certification, that it could be mandatory for them to have to achieve a 'very good' standard.	This wording change has not been made. We did not consider this change to be appropriate as the future policy will mandate the use of assured performance methods (such as Passivhaus) to certify compliance with the policy, rather than using BREEAM.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										Although, there could be a requirement for 'excellent'.	
Reg18-E-133	Climate You Change	Reg18-E-133/159	Climate Emergency							Breeam provide a holistic assessment system framework for sustainable builds. They have certain regulations around areas like greywater systems embedded within their process. Breeam looks at both building fabric and use. The whole process starts before planning, at the feasibility stage for proposed construction methods, recycling etc. Their system makes a big difference in the short term.	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/160	Climate Emergency							[See Reg18-E-133/156] *We would like to include a consideration for the requirements of developers working on medium to large projects against those working on properties providing just one or two individual household dwellings.	This wording change has not been made. We did not consider this change to be appropriate as we wish all schemes to meet the net zero standards set out in policy.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/161	Climate Emergency							<p>We would like to suggest that some consideration is given to green rooves. This can allow for improved thermal mass...greater heat retention in winter and improved cooling in summer. It can also be used to help pollinators, dependant on planting and could be used for food growing, provided there is safe access, sufficient load bearing of roof structure and safe enclosures adequately removing the risk of falling or injury.</p>	<p>Comment noted. The Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. Improvements to biodiversity should be directed elsewhere (such as ground level landscaping).</p> <p>The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.</p>
Reg18-E-133	Climate You Change	Reg18-E-133/174	Climate Emergency							<p>Could the Council look at greatly reducing food which has a limited shelf life from their event catering and food in their staff canteens, to be able to give left over food to other organisations/those in need? (We have heard that not all food left over from events can be given to those in need owing to a limited shelf life, for food safety.)</p>	<p>The Local Plan addresses this topic through the Climate Emergency policies. However, it cannot deliver the change you have requested. Our colleagues in Education department are able to help. We have also provided them with your comments.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/177	Climate Emergency				p.16 9			P.169 General comment on protecting and improving existing housing: Could the Council make it mandatory for residents building flat roof extensions to have a green roof and/or solar panels on the flat rooves in question?	This wording change has not been made. Extensions to existing dwellings can often occur without needing planning permission. The Council encourages the installation of green roofs and solar panels.
Reg18-E-133	Climate You Change	Reg18-E-133/181	Climate Emergency							A general comment on heating in school and any Council owned buildings: Having been told by a Deputy Head at a local school that their heating was high because they had no local control (that the heating for their school was centrally operated in the borough), could this be an area which is dealt with via new policy in the plan?	The Local Plan addresses this topic through the Climate Emergency policies. However, it cannot deliver the change you have requested as it relates to an existing building. Our colleagues in Education department are able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/182	Climate Emergency							If control could not be given to each individual school, then could the Council commit to ensuring that heating is not excessive and contributing to greater greenhouse gas emissions than need be?	The Local Plan addresses this topic through the Climate Emergency policies. However, it cannot deliver the change you have requested as it relates to an existing building. Our colleagues in Education department are able to help. We have also provided them with your comments.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/214	Climate Emergency							Climate change & sustainable solutions workshops - Climate You Change would really like to offer these.	The Local Plan addresses this topic through the Climate Emergency policies. However, it cannot deliver the change you have requested. Our colleagues in Climate Action team are able to help. We have also provided them with your comments.
Reg18-Ae-001	East Ham Assembly	Reg18-Ae-001/186	Climate Emergency							Environment - Needs comp approach to environmental issues - not just making it more difficult to travel for local people	Comment noted. The Climate Emergency and the Environment is considered comprehensively across the Local Plan. The aim of the transport policies is to make transport easier, greener and healthier - not more difficult for local people.
Reg18-E-145	Environment Agency	Reg18-E-145/122	Climate Emergency							In reference to the Climate Change section of the Planning Practice Guidance (PPG) and in line with the objectives of the Climate Change Act 2008, Local Plan policies should tackle climate change and its impacts. We are very pleased to see an entire policy chapter dedicated to tackling and responding to the Climate Emergency.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/123	Climate Emergency							Within our remit, we are specifically concerned with significant climate impacts such as flood and coastal risks, water supply and management, biodiversity, and industrial regulation. As such, we have reviewed the policies within this chapter in consideration of these environmental constraints.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/004	Climate Emergency							[The scope of these representations will focus on the following matters:] <ul style="list-style-type: none"> <li>• The onerous requirements of draft policies relating to energy and sustainability in the context of data centre development; and</li> <li>• Other comments to assist the Council.</li> </ul>	Comment noted.
Reg18-E-093	Greater London Authority	Reg18-E-093/013	Climate Emergency							The Mayor welcomes the progressive policy approach toward climate emergency which Newham Council declared in 2019. The Council set a wide range of measures to tackle climate change and committed to be net zero for council operations by 2030 and net zero in Newham by 2045. The Mayor notes that many of the draft policies are supported by robust evidence and modelling.	Support noted.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/001	Climate Emergency							Environment/Climate Change 1) Develop anaerobic digestion facilities to provide biogas to power combined heat & power (CHP) equipment. Example: Langdon School - grass from playing fields - apple cores etc from packed lunches + food preparation waste (potato peelings etc) if school lunches are prepared on site	The Local Plan addresses this topic through the Climate Change policies. However, it cannot deliver the change you have requested, as the delivery of such projects would be the responsibility of the landowners. Your comments have been passed to colleagues in the Education and Climate Action teams.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/002	Climate Emergency							Environment/Climate Change 2) Floating solar panels on docks	A wording change has not been made, as we would not support floating PVs in the Royal Docks, in light of impacts to ecology and the openness of the water space. This is expanded on further in Policy GWS2.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/121	Climate Emergency							Anerobic digestion of waste in schools	The Local Plan addresses this topic through the Climate Change policies. However, it cannot deliver the change you have requested, as the delivery of such projects would be the responsibility of the landowners. Your comments have been passed to colleagues in the Education and Climate Action teams.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/122	Climate Emergency							Storing grass cuttings of grass for biofuel	The Local Plan addresses this topic through the Climate Change policies. However, it cannot deliver the change you have requested, as the delivery of such projects would be the responsibility of the landowners. Your comments have been passed to colleagues in the Parks and Climate Action teams.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/124	Climate Emergency							Floating PVs on docks - e.g. on reservoir	A wording change has not been made, as we would not support floating PVs in the Royal Docks, in light of impacts to ecology and the openness of the water space. This is expanded on further in Policy GWS2.
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/017	Climate Emergency							Climate Emergency CE1 - CE8 As mentioned in our response to the Issues and Options consultation, The London Borough of Waltham Forest are in full agreement with the approach taken by Newham to address the climate emergency and support the policy approach taken. Waltham Forest are committed addressing the climate emergency and working wherever possible on cross-boundary and other joint strategic issues.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/002	Climate Emergency							<p>Climate change evidence base Great evidence base – but how to ensure it will be followed: sad lessons learned from LLDC</p> <p>I am really pleased to see Levitt Bernstein on the group that has been commissioned to write this evidence base. Who is chosen to provide the evidence base is really important. It needs to be people who are not only knowledgeable but genuinely committed to carbon reduction and making the evidence base as transparent as possible. I've learned this from looking at how the LLDC has handled its 'commitment' to carbon reduction – quite clearly it is committed to PR and spin and profit, not carbon reduction. It has hidden the excellent clear report written by Levitt Bernstein about decarbonisation and instead chosen a huge profit-driven company that uses deceit and slippery nonsense words like 'green gas' – it's a company that has a background in fossil fuels and mining and has only moved into renewables due to regulatory compulsion and profit opportunities. The Newham plan climate change evidence base is really good. Although the situation it has written about is dire, and quite damning, Newham council are to be applauded for commissioning this report and publishing it. It is thorough, clear and transparent, and written by</p>	Comment noted.

<b>Comment Response</b>	
<b>Comment</b>	people clearly genuinely dedicated to stopping climate change. If Newham council acts on this evidence base, it will be a great way forward.
<b>Implementation</b>	
<b>Justification</b>	
<b>Clause</b>	
<b>Introduction</b>	
<b>Site allocation</b>	
<b>Policy</b>	
<b>Chapter</b>	
<b>Comment Reference</b>	
<b>Representor</b>	
<b>Representation Reference</b>	

Reg18-E-027	Resident	Reg18-E-027/003	Climate Emergency						<p>My concern is about who will be assessing the progress going forward, and according to what criteria. With the LLDC, they commissioned Levitt Bernstein to write an evidence base report to assess the baseline of their climate emissions. When the conclusions and recommendations were not to their liking, they hid the report, ignored the recommendations, and did not ever consult with Levitt Bernstein again, instead commissioning a multi-national energy company involved in mining to assess and write a 'decarbonisation plan'. It totally ignores everything the Levitt Bernstein report says and goes against all their recommendations. The plan makes assertions without presenting any evidence to back it up. The problem lies with conflict of interests. There is a problem when the council does not have in-house specialists. When you commission, you have to be very careful about who you commission and what their motives are. Even with the best of intentions (LLDC definitely does not have the best of intentions, but Newham council might), you do need specialist knowledge to assess whether something really is going to deliver on cutting carbon emissions. Problem is, there are plenty of private companies out there who are very skilled at greenwash – and it is very hard to decipher unless you are a scientist. Those companies that sell renewables will of course do so for profit, and that's fine. But you need to have the assessment and recommendations done by someone independent of the provider of the 'decarbonisation/low-carbon technology'</p>	<p>Comment noted. We are exploring options for an in-house energy specialist but that energy submissions made by developers will always be scrutinised by an independent expert.</p>
-------------	----------	-----------------	-------------------	--	--	--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

										<p>- otherwise it's obviously a conflict of interests. This company that LLDC is using for its decarbonisation strategy' is a private company only interested in selling its technology to make profit and in using the cheapest technology when it has to pay for it; how can accountability be served when at the same time, it is being given free rein to both sell its 'low-carbon solutions' and give an assessment as to which technologies are the best? (Though I think if we're going to do that, maybe choosing a company that has a background in fossil fuels and mining and has only recently taken advantage of the economic advantage of pretending to be green isn't the right choice.) The body that is going to assess and monitor the actual carbon emissions and forecasts regarding future carbon emissions of different technical proposals should be independent and making purely factual statements on this; it should not have any stake in cost either way (that is, whether it is too expensive, or whether it makes a profit.)</p>	
Reg18-E-027	Resident	Reg18-E-027/004	Climate Emergency							<p>It's important to note that most of these problems with the LLDC is in its reliance upon and false assertions about the District Heat Network.</p>	Comment noted.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/005	Climate Emergency							<p>'The current planning metric (% improvement over Part L) is not fit for purpose for Net Zero buildings'</p> <p>I fully agree with everything that is stated here and I think the evidence presented is incredibly clear, thorough and strong. It clearly shows that currently buildings can comply with supposed Net zero policies whilst in practice being most definitely not Net Zero.</p> <p>Unfortunately, I can add another example from the LLDC. Using the % relative improvement measure, they've claimed that biomass – and I think they're talking about burning wood here, not anaerobic digestion – has 'reduced CO2 by 72%'. Yet we all know that burning wood is a terrible idea and emits loads of carbon. They've also managed to use some kind of measurements and statistics – though I'm not quite sure what because they don't disclose how they came to this conclusion – to choose 'green gas' and energy from waste from the Edmonton incinerator as the best low carbon solutions in their 'decarbonisation' plan for the District Heat Network. Yet as the Newham Plan evidence base says, 'green gas' is in no way actually going to be available and is not the path that the GLA has chosen. As for the incinerator, well that's clearly going against waste reduction policies and causes air pollution. So I strongly</p>	Support noted. At the present time, we are unaware of the method that the District Heat Network will use to decarbonise.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										agree that it is really important to get the right metric to measure carbon reduction and that the % relative improvement is not fit for purpose. Once again, it's important to note that the measurement problems I am talking about here are mainly about the District Heat Network.	
Reg18-E-098	Resident	Reg18-E-098/025	Climate Emergency							There should also be clear policies to meet net zero and appropriate green standards in all new homes; this is not a trade off with social housing as the Council's current viability assessment implies.	Comment noted. Energy standards do apply to all development. Policies which increase build costs, which the energy policy requirements do, are included in the viability assessment to demonstrate they are deliverable, in line with the NPPF.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/040	Climate Emergency							Net zero standards should be applied to conversions.	Comment noted. Policy CE2 has requirements for new residential units, to ensure that it is Net Zero Carbon in operation, using as little energy as possible over a year. Other conversions would be encouraged to use as little energy as possible over a year.
Reg18-E-098	Resident	Reg18-E-098/041	General							Programmes of Repair, Improvement and subsequent maintenance in both public and private sectors that meet or exceed current standards of energy efficiency while being visually attractive (inc RSLs/RPs) should be encouraged.	<p>The Local Plan addresses this topic through Policy CE5 Retrofit and Circular Economy. However, it cannot deliver the change you have requested, as the Local Plan cannot enforce maintenance of existing buildings. Newham is requesting funding from central government to help landlords, homeowners, housing associations and the Council's housing team to retrofit properties in Newham – to alleviate fuel poverty and the climate crisis.</p> <p>The Local Plan supports retrofit works to properties – noting that various retrofit works on houses can be undertaken without planning permission.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-104	Resident	Reg18-E-104/001	Climate Emergency							<p>Before the latest IPCC reports on the gravity of the climate emergency, relevant planning law for Newham already asserted the priority climate change must have in local plans. Specifically, Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by Section 182 of the Planning Act 2008, states: 'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' Joint guidance from the Royal Town Planning Institute and the Town and Country Planning Association states that 'in discharging this duty, local authorities should consider paragraph 153 of the National Planning Policy Framework (NPPF) and ensure that policies and decisions are in line with the objectives and provisions of the Climate Change Act 2008'.</p> <p>The statutory nature of the legal requirements cited in relation to climate change when developing local plans should be explicitly stated and referenced in the new Local Plan.</p>	Comment noted. The Climate Change Evidence Base considers the Climate Change Act 2008 and other national, regional and local policy as part of the development of the policy. Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in allowing us to meet our targets.
Reg18-E-104	Resident	Reg18-E-104/014	Climate Emergency							The new Local Plan refers to advice to the Planners from BNP Paribas viability consultants: ( <a href="https://www.newham.gov.uk/download">https://www.newham.gov.uk/download</a>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										s/file/5374/london-borough-of-newham-regulation-18-local-plan-viability-study	
Reg18-E-104	Resident	Reg18-E-104/015	Climate Emergency							It is concerning that this appears to undermine professional guidance on the climate change policy and local plan	Comment noted.
Reg18-E-104	Resident	Reg18-E-104/016	Climate Emergency							BNP Paribas state at paragraph 3.39 that “in some cases there may be a need to balance the net zero carbon objective against other plan requirements.” This implies we might have to forgo, for example, affordable housing requirements to keep the zero carbon objectives	Comment noted. Energy standards do apply to all development. Policies which increase build costs, which the energy policy requirements do, are included in the viability assessment to demonstrate they are deliverable, in line with the NPPF.
Reg18-E-104	Resident	Reg18-E-104/017	Climate Emergency							However RPTI guidance is absolutely clear: “Where there are costs to the private sector in ensuring both radical reductions in carbon and long-term resilience, they should be reflected in reduced land prices” and “ensuring that long-term income streams, such as renewable energy generation, are recognised as a positive economic benefit and therefore not recorded as costs in viability valuations.”	Comment noted. Our viability assessors have considered this. They note that over the medium term with ground rents being abolished, most freeholds will be transferred to leaseholders to manage in common and they will use PVs panels on roofs to reduce their own service charges.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-003	Resident	Reg18-K-003/016	Climate Emergency			3. 2				<p>Air quality in Newham is really bad - we live close to the North Circular which doesn't help! Support efforts to improve this - we need less cars on the roads. [A:1]</p>	<p>Comment noted. The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council's Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves 'air quality neutral'.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-003	Resident	Reg18-K-003/017	Climate Emergency			3.20 2				Support, but can you help residents to retrofit? It's very expensive to replace windows, or refurbish a house especially with a mortgage and the high cost of living.	<p>The Local Plan addresses this topic through Policy CE5 Retrofit and Circular Economy. However, it cannot deliver the change you have requested, as the Local Plan cannot deliver improvements to existing buildings. Many homes across Newham are 'lovely but leaky' Victorian and Edwardian period homes. Newham is requesting funding from central government to help landlords, homeowners, housing associations and the Council's housing team to retrofit properties in Newham – to alleviate fuel poverty and the climate crisis.</p> <p>The Local Plan supports retrofit works to properties – noting that various retrofit works on houses can be undertaken without planning permission.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-038	Resident	Reg18-T-038/010	Climate Emergency							<p>I am sure the council is already too aware of the impending dangers of climate change, which seems inevitable to continue when we have leaders who are simply out to make money, be famous or play along for votes. We have seen the devastation of the heatwave last year in the whole country and in Newham. It will continue to get worse, and flooding is a real danger, which we have also seen in Newham and local boroughs. [Originally submitted in response to T1]</p>	<p>Comment noted. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p>In December 2023, Newham Council became the first local authority in the country to launch a Climate Action Just Transition Plan. It provides a blueprint to address the unequal impacts of climate change on Newham's residents who are disproportionality impacted by the climate emergency, but pay the highest costs for climate adaptation.</p> <p>Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.</p>



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-038	Resident	Reg18-T-038/011	Climate Emergency							<p>We will not help people live better lives by building more houses and concrete structures by removing green spaces, which helps absorb temperature and carbon dioxide from the atmosphere. We know the land is not growing, and only population is. Say what must be said, without adding to the destruction, dear leaders. [Originally submitted in response to T1]</p>	<p>Comment noted. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p>In December 2023, Newham Council became the first local authority in the country to launch a Climate Action Just Transition Plan. It provides a blueprint to address the unequal impacts of climate change on Newham's residents who are disproportionality impacted by the climate emergency, but pay the highest costs for climate adaptation.</p> <p>Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-038	Resident	Reg18-T-038/013	Climate Emergency							<p>[Add to it] New building which seem beautiful, shiny and makes developers rich and council count the numbers of new accommodation, they are adding to destruction for the long run as they make everything hotter in the environment. [Originally submitted in response to W1]</p>	<p>Comment noted. In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p>In December 2023, Newham Council became the first local authority in the country to launch a Climate Action Just Transition Plan. It provides a blueprint to address the unequal impacts of climate change on Newham’s residents who are disproportionality impacted by the climate emergency, but pay the highest costs for climate adaptation.</p> <p>Planning policy, through ensuring that new buildings are designed and built to net zero targets and encouraging and enabling retrofitting of existing buildings, has a key role in delivering these measures to meet our targets.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-058	Resident	Reg18-T-058/001	Introduction							<p>[Please provide any comments and feedback on the *Introduction*.] Firstly I am concerned about the Air pollution,</p>	<p>Comment noted. The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council’s Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves ‘air quality neutral’.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-058	Resident	Reg18-T-058/007	All about Newham							<p>[Please provide any comments and feedback on *Section 1: All about Newham*.] Firstly I am concerned about the Air pollution,</p>	<p>Comment noted. The Local Plan addresses this topic through the Climate Emergency and Transport policies. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p> <p>The Council has a statutory duty to regulate air quality throughout the borough, from sources such as industrial processes, planning &amp; development, transport infrastructure, energy and heating and domestic wood burning.</p> <p>The Council's Environmental Health team permits and inspects industrial facilities, reports and acts upon pollution, investigates bonfires and dark smoke nuisances and works with developers to ensure that new development achieves 'air quality neutral'.</p> <p>Other teams across the Council – including the Highways and Public Health teams – work to improve air quality through other efforts including electrification of the road network</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-110	Resident	Reg18-T-110/014	Vision and Objectives							<p>[Please provide any comments and feedback on *Section 2: Vision and Objectives*.]Support and grants should be provided to retrofit homes to improve energy efficiency and lower bills. This would generate work, help households with spiralling bills and help achieve the net zero goals.</p>	<p>Comment noted. The Local Plan addresses this topic through Policy CE5 Retrofit and Circular Economy. However, it cannot deliver the change you have requested, as the Local Plan cannot deliver improvements to existing buildings. Many homes across Newham are 'lovely but leaky' Victorian and Edwardian period homes. Newham is requesting funding from central government to help landlords, homeowners, housing associations and the Council's housing team to retrofit properties in Newham – to alleviate fuel poverty and the climate crisis.</p> <p>The Local Plan supports retrofit works to properties – noting that various retrofit works on houses can be undertaken without planning permission.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/026	Climate Emergency							<p>D) Climate Change Documents</p> <p>The following documents are understood to form relevant the Policies and supporting evidence base for climate change:</p> <ul style="list-style-type: none"> <li>• Newham Draft Local Plan (Regulation 18) December 2022</li> <li>• Newham Climate Change Evidence Base Part 1: Operational Energy &amp; Carbon</li> <li>• Newham Climate Change Topic Paper Part 2: Embodied Carbon</li> <li>• Newham Climate Change Technical Note Part 2: MMC and Embodied Carbon</li> <li>• Newham Climate Change Guidance and Topic Paper Part 3: Overheating</li> <li>• Newham Climate Change Topic Paper Part 4: Retrofit</li> </ul> <p>These have been reviewed in relation to the approved Energy and Sustainability statement entitled:</p> <ul style="list-style-type: none"> <li>• Thameside West Energy and Sustainability Statement &amp; Addendum 0035668 R03 (16th May 2019)</li> </ul> <p>Broadly, there is no objection or comment on the validity of the content of the evidence base papers.</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/027	Climate Emergency							<p>However, a number of conflicts between the requirements of the draft new Local Plan (2022) policies and the design of the consented scheme have been identified and set out in the sections below.</p> <p>Recommendation</p> <p>SHL suggests that:</p> <ul style="list-style-type: none"> <li>• LBN clarifies in the supporting text relating to policy that the policy requirements only relate to the determination of planning applications moving forwards and that the policy requirements will not be retrospectively applied to consented / legacy schemes (or flexibility given at the very least).</li> </ul>	Comment noted. Planning applications are determined against the current Development Plan. Reserved matters and other changes to developments would be considered against the outline planning permission, any new policies can only over-ride on matters which have not already been established in principle by the outline permission.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/147	Climate Emergency							<p>The Berkeley Group recognises the importance of reducing carbon emissions to minimise climate change and we have adapted our business to help ensure that the homes we create remain resilient to changes in temperatures. As well as focusing on efficiencies, we are now going beyond Government requirements by compiling a zero carbon transition plan for each new development to enable the homes to operate at net zero carbon by 2030. This is to ensure we incorporate the right long-term infrastructure into our developments. We therefore support the Council's intentions to ensure Local Plan policy plays a role in mitigating and adapting to</p>	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
										climate change and maximising environmental benefits.	
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/078	Climate Emergency							Climate - Atherton Leisure Centre. Busy SE/S	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan.
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/079	Climate Emergency							Solar panels! Cover it	The Local Plan addresses this topic through the Climate Change policies. New developments will be required to have solar panels, and we will be collecting offset payments from new development for the installation of solar panels elsewhere in the borough. However, the policy cannot deliver the change you have requested, as the delivery of such projects would be the responsibility of the landowners. Your comments have been passed to colleagues in the Climate Action team.



Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/080	Climate Emergency							Bolton Road - housing association - solar panels	The Local Plan addresses this topic through the Climate Change policies. New developments will be required to have solar panels, and we will be collecting offset payments from new development for the installation of solar panels elsewhere in the borough. However, the policy cannot deliver the change you have requested, as the delivery of such projects would be the responsibility of the landowners. Your comments have been passed to colleagues in the Climate Action team.
Reg18-E-054	University College London	Reg18-E-054/012	Climate Emergency							UCL is committed to combatting the climate emergency. In line with draft Policy CE1, reduced consumption and minimised impacts have been built into the UCL East development through design, construction, and operational stage. In line with draft Policies CE2, CE3, and CE4, UCL East will be contributing towards achieving zero carbon development through buildings which have been designed with features to minimise non-renewable energy usage, prevent overheating, and capture embodied carbon. UCL previously responded to LLDC's Getting to Net Zero SPD Consultation in July 2022 and	Comment noted.

<p><b>Comment Response</b></p>	
<p><b>Comment</b></p>	<p>supported LLDC’s acknowledgment of the need for targets to go beyond that set out in their current planning policy, such as targets that go beyond the net zero carbon target, and would request to see such aspirations set out with LBN’s New Local Plan going forward.</p>
<p><b>Implementation</b></p>	
<p><b>Justification</b></p>	
<p><b>Clause</b></p>	
<p><b>Introduction</b></p>	
<p><b>Site allocation</b></p>	
<p><b>Policy</b></p>	
<p><b>Chapter</b></p>	
<p><b>Comment Reference</b></p>	
<p><b>Representor</b></p>	
<p><b>Representation Reference</b></p>	