



From: Gail De souza [REDACTED]
Sent: 01 July 2026 00:57
To: Local Plan; planning@newham.gov.uk; Planning Obligations; Planning Validation
Cc: [REDACTED]
Subject: Proposed Main Modifications to the Newham Local Plan 2026 – 2042

Dear Planning Team & others

I was unable to put comments on the portal as there was not facility to do so. By way of this email I am raising concerns.

NEWHAM LOCAL PLAN – MAIN MODIFICATIONS (ED030–ED034) RESPONSE

1. Deliverability and funding certainty (ED030 + supporting evidence base)

I support the principle of an updated Local Plan; however, I am concerned that the Schedule of Main Modifications (ED030) is not fully supported by transparent evidence demonstrating deliverability over the plan period.

The Plan does not clearly evidence:

- funding certainty for infrastructure required to support growth;
- the scale of potential funding gaps;
- reliance on developer contributions versus public investment;
- timing of infrastructure delivery relative to housing growth.

A sound Local Plan must be both justified and demonstrably deliverable, supported by the Infrastructure Delivery Plan and viability evidence base.

2. Infrastructure capacity and alignment (ED030 + ED032 IIA Addendum)

The modifications in ED030, when considered alongside the Integrated Impact Assessment Addendum (ED032), do not sufficiently demonstrate that infrastructure capacity is aligned with planned growth.

Key concerns include:

- healthcare and school capacity constraints in high-growth areas;
- transport infrastructure pressure in regeneration zones;
- community facility provision lagging behind development;
- uncertainty over utilities and climate adaptation infrastructure.

While ED032 assesses impacts, it does not clearly demonstrate that mitigation is funded, phased, or enforceable.

Infrastructure must be delivered in step with development rather than retrospectively.

3. Cumulative impacts and equality (ED032 + ED030)

The Integrated Impact Assessment (ED032) considers equality and health impacts; however, cumulative impacts arising from multiple Main Modifications in ED030 do not appear to be fully assessed.

In a borough such as Newham, where deprivation and health inequalities are significant, the Plan should clearly demonstrate:

- how cumulative development impacts are assessed across wards;
- how health inequalities are mitigated in practice;
- how environmental burdens are not disproportionately concentrated in specific communities.

The evidence should demonstrate that the Main Modifications do not unintentionally reinforce existing spatial inequalities.

4. Environmental sustainability and climate resilience (ED033 + ED032)

The Habitats Regulations Assessment Addendum (ED033) and Integrated Impact Assessment (ED032) provide important safeguards; however, further clarity is required that:

- climate adaptation is embedded across ED030 policies rather than treated separately;
- flood risk management is fully integrated into spatial planning decisions;
- biodiversity net gain requirements are enforceable and measurable;
- air quality impacts in dense urban areas are effectively mitigated.

Consistency should be demonstrated between ED030 policies and the conclusions of ED032 and ED033.

5. Policies Map consistency (ED031 + ED030)

The Policies Map changes (ED031) must be fully consistent with the policy modifications set out in ED030.

Clarification is required that:

- boundary changes do not reduce protection of employment land or green infrastructure;
- spatial designations align with regeneration and housing strategy intentions;
- no unintended consequences arise from map amendments not reflected in policy wording.

Given the strategic importance of spatial designation, ED031 must be clearly justified and aligned with ED030.

6. Monitoring, governance and accountability (ED030)

The Plan would be strengthened by clearer mechanisms for monitoring delivery of the Main Modifications in ED030.

It is currently unclear:

- how delivery performance will be monitored annually;
- what corrective mechanisms exist if targets are not met;
- how transparency will be maintained post-adoption;
- how infrastructure delivery progress will be publicly reported.

A sound Local Plan requires clear governance structures, measurable indicators, and defined accountability mechanisms.

Conclusion

While I support the principle of an updated and evidence-based Local Plan, I request that the Inspector ensures that the Proposed Main Modifications in ED030, supported by ED031, ED032 and ED033, are justified by clear evidence of:

- deliverability and financial viability;
- infrastructure capacity and phasing;
- cumulative equality and health impacts;
- climate and environmental resilience;
- consistency between spatial and policy changes;
- transparent governance and monitoring.

A sound Local Plan must demonstrate not only policy compliance, but also that it is realistically deliverable, equitable and capable of supporting sustainable long-term growth across Newham.

Please would you confirm receipt and provide a response to the concerns above.

Kind regards

Gail De Souza - Newham Resident
 Mr & Mrs Smith - Newham Resident
 Mr John Gillow - Newham Resident