London Borough of Newham Council
Local Plan – Integrated Impact Assessment

Post Adoption Statement

October 2026



Document distribution

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Post Adoption Statement

Public

October 2026

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Prepared by:	EA	September 2026
Reviewed by:	AP	September 2026
Approved by:	AM	October 2026

Revisions

Rev	Date	Details
1	22/09/26	Draft for internal review
2	01/10/26	Draft for client review
3	06/10/26	Final

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1. Introduction

This report forms the Post Adoption Statement (PAS) to accompany the London Borough of Newham's adopted Local Plan. The report describes the way in which the Council has taken environmental considerations and the views of consultees into account in the adopted Local Plan and fulfils the plan and programme adoption requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633).

1.1 London Borough of Newham's Local Plan

1.1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the regulatory requirements for developing and adopting a Local Plan. Before adoption, this involves preparing and consulting on what the Local Plan should contain (Regulation 18), producing a Publication Draft Local Plan (Regulation 19), submitting the Local Plan to the Secretary of State for Housing, Communities and Local Government (Regulation 22) and subjecting the Local Plan to public examination (Regulation 24).

1.1.2 The Newham Local Plan sets out the spatial strategy for Newham for a fifteen-year period between 2026 and 2042. The spatial strategy identifies the location, scale and uses of development that will come forward in Newham and demonstrates how needs of Newham's current and future population will be met. This includes the need, set by the London Plan 2021, to deliver at least 47,600 additional homes in Newham over the period 2019/20 to 2028/29. The Newham Local Plan also seeks to meet Newham's needs for:

- a requirement for 418,000 sqm of industrial floorspace;
- a minimum requirement for 118,000 sqm of office floorspace; and
- 25,973 sqm of retail floorspace.

1.1.3 The new Local Plan will replace the adopted Local Plan (2018), Gypsy and Traveller Accommodation Development Plan Document (2017) and the London Legacy Development Corporation Local Plan 2020 – 2036, insofar as it applies to the area now covered by the Newham Local Plan. The review of the Local Plan included multiple rounds of consultation and engagement. The first round of engagement on the Issues and Options document took place between the 18 October and the 17 December 2021. The second round of engagement (on the Regulation 18 draft Local Plan) took place between 9 January and the 20 February 2023. A third round of engagement on the Regulation 19 Draft Submission Local Plan took place between 19 July to 20 September 2024. The Draft Submission Newham Local Plan (June 2024) was submitted to the Secretary of State on 18th July 2025 with hearing sessions taking place between December 2025 and February 2026. The Council then consulted on Main Modifications to the Newham Local Plan between 26 May 2026 and 7 July 2026. Following receipt of the Inspector's report in August 2026, the Local Plan is being considered for formal adoption by the Council.

1.2 Integrated Impact Assessment (IIA) of the Local Plan

1.2.1 IIA is a systematic process that is undertaken during the preparation of Local Plans and spatial development strategies. Its role is to promote sustainable development by assessing environmental, social and economic impacts, as well as mitigating any potential adverse effects that the emerging plan might otherwise have.

1.2.2 The IIA combines the following assessment processes:

- Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment - SEA);
- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Habitats Regulations Assessment (HRA).

1.2.3 In this context, the purpose of the IIA of the Local Plan has been to:

- identify the potentially significant environmental effects of the Local Plan in terms of the policies, vision and objectives proposed by Newham Council;
- help identify appropriate measures to avoid, reduce or manage adverse effects and to enhance beneficial effects associated with the implementation of the Local Plan wherever possible;
- give the statutory SEA bodies, stakeholders and the wider public the ability to see and comment upon the effects that the Draft Local Plan may have on them, their communities and their interests, and encourage them to make responses and suggest improvements for inclusion in the adopted Local Plan; and
- inform Newham Council's preferred approach taken forward into the adopted Local Plan.

1.2.4 The key stages of the IIA process are as follows:

- **Stage A:** Setting the context and objectives, establishing the baseline and deciding on scope;
- **Stage B:** Developing and refining strategic alternatives and assessing their effects (including the EqIA, HIA and HRA assessments);
- **Stage C:** Preparing the IIA Report and supporting assessments e.g. EqIA, HIA and HRA;
- **Stage D:** Consulting on the draft plan and the IIA Report and prepare a Post Adoption Statement (this stage); and
- **Stage E:** Monitoring the significant effects of implementing the plan or programme on the environment.

1.2.5 Consultation on the scope of the IIA (Stage A) was undertaken between October – December 2021. Consultation responses were used to refine the proposed scope and approach to the IIA. The Regulation 18 Local Plan was then subject to IIA (Stage B). This assessed the likely significant effects on the environment of the Draft Local Plan including an assessment of reasonable alternative and preferred options. The findings of the assessments were presented

in an IIA Report (Stage C) that was published for consultation alongside the Regulation 18 Local Plan consultation in January - Feburary 2023 (Stage D).

1.2.6 The Regulation 19 Local Plan was later subject to IIA, and the findings of the Regulation 19 IIA Report (Stage C) were published for consultation in July - September 2024 (Stage D). The Local Plan and IIA Report (Stage C and D) were submitted for examination in July 2025. Consultation on the proposed Main Modifications to the Local Plan and the IIA Report Addendum (Stages C and D) was carried out from May - July 2026. At this stage, the IIA PAS (Stage D) has been prepared to be published alongside the adopted Local Plan.

1.3 Purpose of the Post Adoption Statement

1.3.1 Regulation 16 (4) of the SEA Regulations require that when a plan or programme is adopted (in this case, the Local Plan), the consultation bodies, the public, and any other Member States consulted on the IIA Report are informed and the following specific information is made available:

- the plan as adopted; and
- a statement summarising:
  - how environmental considerations have been integrated into the Local Plan;
  - how the IIA Report has been taken into account;
  - how opinions expressed in response to the consultation on the Draft Local Plan and the IIA Report have been taken into account;
  - the reasons for choosing the Local Plan, as adopted, in the light of the other reasonable alternatives dealt with; and
  - the measures that are to be taken to monitor the significant environmental effects of the implementation of the Local Plan.

1.3.2 The purpose of this PAS is to provide the specific information outlined under each of the points listed above and which is presented in the following sections of this statement.

2. How environmental and sustainability considerations have been integrated into the Local Plan and IIA

2.1 Environmental and sustainability considerations for the Local Plan

2.1.1 Environmental and sustainability considerations (including health and equalities) have been integrated throughout the development of the Local Plan and are embedded in its vision, objectives and policies.

2.1.2 The Local Plan objectives are set out below:

1. **A healthier Newham and ageing well**
    - Improving physical and mental health and well-being will be prioritised, to ensure we reduce health inequalities through a health integrated approach to planning.
    - Health will be promoted through the creation of healthy environments with clean air, no food deserts and no food swamps.
    - The health, happiness and wellbeing of our residents will be measured to monitor the success of developments and the Local Plan.
    - Accessible and age-friendly communities and environments will be created.
    - The accessibility and quality of healthcare facilities and services will be improved to meet growing demands for healthcare as our population increases.
2. **An inclusive economy to support people in these hard times**
    - All residents will have access to local job opportunities, education, training and skill development.
    - Our local economy will be supported through improving the quantity, range and affordability of employment space.
    - The delivery of London's first London Living Wage neighbourhood will be supported.
    - Access to employment through sustainable transport infrastructure and active travel will be improved.
    - Businesses and residents will have access to the utilities and digital infrastructure required to function in the new economy.
3. **People-friendly neighbourhoods with green and clean streets**

- A greener and cleaner future in Newham will be created, to tackle the Climate Emergency through zero carbon development, retrofitting existing buildings and building climate resilient neighbourhoods.
- Biodiversity and access to nature will be improved, to support plants, animals and residents to thrive.
- Well-designed, clean and litter-free network of well-connected neighbourhoods will be created, which encourage physical activity, active travel, green public transport and reduced car use, resulting in greener streets and public spaces.
- Provision of, and access to, high streets, social infrastructure, green and open spaces will be increased through the delivery of a network of well-connected neighbourhoods.
- Our unique and diverse heritage will be protected and celebrated, requiring new development to be well-designed and that old and new buildings are well integrated.

4. **Safer Newham where no-one feels at risk of harm**
    - Crime and fear of crime will be reduced and safe spaces and streets will be created through better, more inclusive, design of the public realm, including green and open spaces.
5. **Homes for residents**
    - The homes required to meet the diverse needs of our population, including a range of specialist housing options to provide care choices, greater independence and support, will be delivered.
    - Housing quality across the borough will be improved.
    - Delivery of family homes at social rent will be prioritised because that is our most pressing need.
    - Housing design will recognise, celebrate and function well for Newham's diverse communities.
6. **Supporting young people to have the best start in life and reach their potential**
    - Our public, play, study and creative spaces and social infrastructure will create high quality, safe, fun and welcoming spaces for all young people.
    - The accessibility of public transport for young people will be improved.
    - Existing, new and improved access to education and childcare provision will be protected and delivered.
    - Skills and career development will be provided to support young people's long term employment prospects in growth sectors
7. **People powered Newham and widening participation in the life of the borough and the work that the Council does**

- A more equal and affordable borough will be created, which reduces poverty and increases civic participation and inclusive opportunities for all.
- Sufficient physical, social, civic and digital infrastructure will be provided, as part of delivering inclusive growth which meets the needs of existing and future communities in Newham.
- Co-design principles will be embedded in delivering new development.
- Access to high streets, social infrastructure (to enable support networks), and green space will be improved through the delivery of a network of well-connected neighbourhoods, to create happier communities.
- New development will improve social integration.
- Cultural events, spaces and businesses will be supported.

2.1.3 The policies set out in the Local Plan seek to deliver the objectives outlined above, which includes measures to avoid and minimise adverse effects and also deliver enhancements to the environment and sustainability of the borough. The IIA process has informed each stage of the plan-making and the development of the adopted Local Plan.

2.2 Environmental and sustainability considerations in the IIA

2.2.1 Environmental and sustainability considerations were integrated into the preparation of the Local Plan throughout the IIA process.

Scoping

2.2.2 To provide the context for the IIA, and in compliance with the SEA Regulations, the relevant aspects of the current state of the environment and its evolution without the Local Plan were considered at the outset of the IIA process, along with the environmental characteristics likely to be significantly affected by the plan. This information was contained in the IIA Scoping Report and subsequently updated and included as part of the IIA Report.

2.2.3 The key environmental, social, and economic issues identified across the Borough and reflected in the assessment of Local Plan are summarised in **Table 2-1** below.

Table 2-1 Identified key environmental and sustainability issues

Identified Key Environmental and Sustainability Issues
1. Concerns regarding the future of town centres
2. The mixed quality of local neighbourhoods and town centres
3. Lack of facilities and opportunities for young people
4. High levels of deprivation in some parts of the borough
5. Levels of crime and fear of crime

Identified Key Environmental and Sustainability Issues
6. Poor levels of health and wellbeing, high levels of health inequality
7. Lower number of conservation areas and listed buildings when compared to neighbouring boroughs
8. High levels of residents claiming Universal Credit
9. Household incomes significantly below the national average
10. Wish to encourage continued growth of local businesses and jobs, attracting inward investment
11. Low proportion of resilient businesses
12. Retaining economic benefits in the borough
13. Maintaining improvement in education levels, childcare, education and training facilities
14. Poor quality of housing accommodation in the borough
15. High cost of renting and purchasing housing in the borough
16. High levels of homelessness
17. Insufficient quantity of housing delivered in the borough
18. Low levels of energy efficiency of housing in the borough serious implications from the Climate Emergency – mitigation and adaption measures to respond to impacts are required
19. High levels of fuel poverty
20. Poor recycling rate
21. Increased flood risk from rivers, sea and surface water and groundwater
22. Newham is within an area of serious water stress and new development needs to incorporate water efficiency measures
23. Need to improve water quality in rivers and protect groundwater when building on previously contaminated land
24. Very high levels of poor air quality
25. Legacy of contaminated land throughout the borough
26. Open space deficiencies – lack of access to green space
27. Low level of tree coverage
28. Poor quality existing green & water infrastructure and open spaces.
29. Low levels of biodiversity, habitats and species in the borough
30. Barriers throughout the borough due to roads, railways, rivers and urban grain
31. Walking and cycling modal share is low compared to other boroughs
32. Not all stations in the borough are accessible

Identified Key Environmental and Sustainability Issues
33. Low levels of waste reused, recycled or reclaimed, and high levels of waste sent to landfill
34. Large areas of the borough affected by noise from roads and London City Airport

2.2.4 Informed by the key issues, a draft assessment framework was developed to assess the environmental, social, and economic effects of the Local Plan, and revised to reflect scoping consultation comments. The assessment framework sets out a number of assessment objectives relating to the key issues identified in **Table 2-1**. For each assessment objective, guide questions were also provided. The IIA framework shown in **Table 2-2** was used to assess the Local Plan.

Table 2-2 IIA framework

IIA objective	Shorthand	Appraisal prompt questions
SO1: Promote diverse and economically thriving town centres.	SO1: Town Centres	• Will the policy support diverse town centres that serves the varied needs of residents? • Will the policy allow for town centres to be located near residents homes and taking future growth into account?
SO2: Ensure that neighbourhoods are liveable, safe, high quality with good accessibility to retail, leisure, culture, healthcare, education and open space.	SO2: Neighbourhoods	• Will the policy increase access for all residents to services, facilities and amenities? • Will the policy promote high quality public realm? • Will the policy reduce crime, improve perceptions of safety and reduce the fear of crime?
SO3: Maintain local distinctiveness and protect and enhance place-making assets.	SO3: Place-making	• Will the policy protect sites, features and areas of historical, archaeological and cultural importance? • Will the policy promote high quality architecture and design? • Will the policy encourage locally distinctive spaces? • Will the policy conserve neighbourhood character?
SO4: Encourage growth of local businesses, attract inward investment and increase employment	SO4: Employment	• Will the policy support local business growth? • Will the policy encourage new investment in the borough? • Will the policy improve access to employment? • Improve access to employment for those groups currently experiencing above average worklessness?
SO5: Ensure that economic benefits are retained within the borough following Community Wealth Building principles	SO5: Economic benefits	• Will the policy support local business growth? • Will the policy assist in retaining economic benefits within the borough?
SO6: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	SO6: Education	• Will the policy improve opportunities for learning at all ages? • Will the policy allow for new schools and other education facilities in the right locations?
SO7: Improve the existing housing stock in the borough	SO7: Housing stock	• Will the policy improve the existing housing stock in the borough?

IIA objective	Shorthand	Appraisal prompt questions
		• Will the policy encourage retrofitting and other improvements? • Will the policy allow homes to evolve to meet changing • needs?
SO8: Increase the supply of housing, choice and quality of affordable housing in the borough	SO8: Housing supply	• Will the policy encourage a mix of density, standards, sizes and mix of housing? • Will the policy encourage high quality design and energy standards, including energy and heat? • Will the policy increase access to housing? • Will the policy help people on moderate and lower incomes house themselves?
SO9: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	SO9: Climate change	• Will the policy reduce the emission of greenhouse gases? • Will the policy reduce the impacts of, and respond to climate change? • Will the policy support a Net Zero future? • Will the policy encourage retrofitting of older buildings? • Will the policy mitigate against the effects of climate change – heat, flooding etc?
SO10: Ensuring high standards of sustainable design are achieved in the built environment.	SO10: Sustainable design	• Will the policy set high standards for sustainable design? • Will the policy promote high quality architecture and design? • Will the policy allow for less use of energy, water and materials during the whole life of a building?
SO11: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.	SO11: Natural resources	• Will the policy improve water quality (including groundwater), reduce piped water use and/or reduce waste water? • Will the policy minimise the production of waste across all sectors and increase reuse, recycling, remanufacturing and recovery rates? • Will the policy promote development on brownfield sites? • Will the policy protect residents from existing poor air quality? • Will the policy assist in reducing levels of poor air quality?

IIA objective	Shorthand	Appraisal prompt questions
SO12: Avoid, reduce and manage all forms of flood risk	SO12: Flood risk	• Will the policy assist in avoiding, reducing and managing all forms of flood risk, including from the sea, rivers, groundwater and surface water? • Does the policy promote the use of sustainable urban drainage systems? • Does the policy take into account potential flood risk, minimising harm to people or property?
SO13; Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	SO13: Land quality	• Will it improve soil quality? • Will the policy promote development on brownfield sites? • Will the policy mitigate adverse effects of contaminated land on human health?
SO14: Address existing open space deficiencies and improving existing green & blue infrastructure and open spaces.	SO14; GBI	• Will the policy help to expand the amount of green space in the borough, especially in areas of open space deficiencies? • Will the policy improve the quality of open space? • Will the policy enhance green and blue infrastructure?
SO15: Protect, enhance and increase biodiversity, habitats and species in the borough	SO15: Biodiversity	• Will the policy protect, conserve and enhance natural habitats in the borough? • Will it create new habitats, including new open space • and green roofs?
SO16: Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road.	SO16: Sustainable transport	• Will the policy encourage a shift to sustainable modes of transport, away from private cars? • Does the policy prioritise active travel modes? • Will the policy improve the accessibility of the transport network? • Will the policy contribute to Vision Zero goals (reducing deaths or serious injuries on roads)? • Will it encourage development at locations that enable walking, cycling and/or the use of public transport? • Will the policy improve connectivity and expand the transport network?

IIA objective	Shorthand	Appraisal prompt questions
SO17: Reduce amount of waste sent to landfill and increase reuse, recycling, and recovery.	SO17: Waste	• Will the policy minimise the production of waste across all sectors and increase reuse, recycling, remanufacturing and recovery rates? • Will the policy make appropriate provision for waste management facilities to meet the London Plan apportionment target?
SO18: Provide quality community facilities and infrastructure in the right location for residents.	SO18: Community facilities	• Will the policy promote social cohesion and integration? • Will the policy allow for community facilities to be located in the right location and accessible to all? • Will the policy encourage high quality design?
SO19: Encourage greater community cohesion and reduce poverty, Racism, Inequality and Disproportionality.	SO19: Inclusion	• Will the policy promote social cohesion and integration? • Will the policy promote equity between population groups? • Will the policy tackle Racism, inequality and disproportionality?
SO20: Improve and increase the facilities and opportunities for young people.	SO20: Young people	• Will the policy improve access to facilities and opportunities for young people? • Will the policy increase opportunities for young people?
SO21: Contribute towards reducing crime and the fear of crime.	SO21: Crime	• Will the policy improve perceptions of safety and reduce the fear of crime?
SO22: Improve the health and wellbeing of the population and reduce health inequalities.	SO22: Health and wellbeing	• Will the policy reduce health inequalities? • Will the policy increase access to health, leisure and open space facilities? • Will the policy improve mental and physical health and wellbeing?

Assessment and report preparation

2.2.5 The Local Plan, including its vision, objectives, policies, site allocations and any reasonable alternatives, was assessed against the IIA framework to identify any potential effects arising from its implementation. Through the appraisal of the Local Plan, the cumulative effects of the plan as a whole (intra-plan) and in-combination with other plans and programmes (inter-plan) have been considered on a topic by topic basis.

2.2.6 The Local Plan was assessed based on the nature of the effect, the sensitivity of the human or environmental receptor that could be affected, and how long any effect might last. Assessment matrices were used to record the assessment findings.

2.2.7 In addition, a HRA was carried out to inform both the IIA and the development of the Local Plan.

3. How the findings of the IIA Report have been considered

3.1 Overview

3.1.1 The IIA was carried out iteratively alongside the development of the Local Plan, with the assessment findings informing the development and refinement of the Local Plan at each stage. This includes the selection of the preferred approach in light of reasonable alternatives. Newham Borough Council utilised the outputs from the IIA and feedback from stakeholders to inform the Local Plan.

3.1.2 The IIA process (as documented in the Regulation 22 IIA Report (April 2025)) has informed the development of Local Plan by identifying the baseline environmental conditions, assessing likely significant effects and reasonable alternatives, and proposing monitoring measures.

3.1.3 **Table 3-1** below details key stages of the IIA and its relationship with the development of the Local Plan.

Table 3-1 Key Stages in the development of the IIA and its relationship with the Local Plan

IIA Stage	IIA outputs	Relationship with the Local Plan
Scoping	The IIA Scoping Report: • Identified other relevant plans, programmes and environmental protection objectives which could be affected by, or which could affect, the revised NPS; • Characterised the relevant aspects of the current state of the environment and its evolution without the revised NPS; • Identified key environmental and sustainability issues; and • Presented the IIA framework of objectives to address the key issues and appraise the Local Plan.	The information presented in the Scoping Report, including policy context, baseline information and key issues was available early in plan-making to inform the development of the Local Plan.
Assessment and Reporting	The IIA Reports (Regulation 18 in 2023, Regulation 19 in 2024 and Regulation 22 in 2025) provided an assessment of the Draft Local Plan against the IIA framework, including an assessment of the: • Vision and objectives;	The findings of the IIA helped inform the selection of the preferred approach and development of policies in the Local Plan. The IIA also identified mitigation to reduce the significance of any negative effects identified and opportunities

IIA Stage	IIA outputs	Relationship with the Local Plan
	• Spatial strategy, including reasonable alternatives; • Approach to planning for a network of well-connected neighbourhoods, including reasonable alternatives; • Quantum of employment land for industrial uses, including reasonable alternatives; • Thematic policies, including reasonable alternatives; • Neighbourhood polices; and • Site allocations. The key findings of the IIA are presented in Section 3.2 below. An IIA Report Addendum was produced that screened the proposed Main Modifications to determine if they significantly affected the findings set out in the previous IIA Reports.	to enhance the positive effects of the Local Plan.
Post Adoption Statement	This Post Adoption Statement includes a monitoring framework which sets out monitoring measures to assess potential effects arising from the Local Plan (Section 6).	Monitoring measures have been informed by the IIA and will help to assess the implementation of the Local Plan and identify significant environmental effects arising from implementation of the Plan.

3.2 Key findings of the IIA

3.2.1 As demonstrated in **Table 3-1** above, the IIA process has played an important role in the development of the Local Plan.

3.2.2 The IIA Report assessed policies and proposed allocations in the Local Plan and any reasonable alternatives across the following topics:

- Vision and objectives;
- Spatial strategy;
- The role of neighbourhoods;
- Quantum of employment land for industrial uses;
- Thematic policies, including consideration of reasonable alternatives; and
- Site allocations, including consideration of reasonable alternatives.

3.2.1 The key findings of the IIA Report for the Local Plan as a whole are presented in **Table 3-3**, with the key to assessment presented in **Table 3-2** below.

Table 3-2 Key to assessment

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

Table 3-3 Cumulative, Synergistic and Secondary Effects of Policies and Sites

IIA Objectives	Building a Fairer Newham	Social Infrastructure	Design	Green and Water Spaces	Economy	High Street	Homes	Climate Change	Transport	Waste and Utilities	Neighbourhood polices
SO1: 'Town Centres'	+	+	+	+	++	+	+	+	+	+	++
SO2: 'Neighbourhoods'	+	++/?	+	++/?	+	+	+	+	++	+	++
SO3: 'Place-making'	+	+	+	++	+	+	+	+	++	+	++/-
SO4: 'Employment'	+	++	~	+	++	+	~	+	++	+	++
SO5: 'Economic benefits'	+/?	+	~	+	++	+	~	~	+	+	++/?
SO6: 'Education'	+	++	~	+	~	~	+	~	++	+	++
SO7: 'Housing stock'	+	~	~	~	~	~	~	~	~	~	++
SO8: 'Housing supply'	+	~	+	~	~	+	+	~	~	~	++
SO9: 'Climate change'	+/--/?	~	+	+	+	~	~	++	+	+/?	+/--/?
SO10: 'Sustainable design'	+	+	+	~	~	~	~	++	++	+	+
SO11: 'Natural resources'	+	~	+	++	+	~	~	+	+	++/?	++/?
SO12: 'Flood risk'	+	~	~	~	~	~	~	++	~	~	--
SO13: 'Land quality'	+	~	~	+	~	~	~	~	~	~	++
SO14; 'GBI'	+	~	+	++/?	~	~	~	~	~	~	++/?
SO15: 'Biodiversity'	+	~	+	++	~	~	~	~	+	+	++/-/?
SO16: 'Sustainable transport'	+	+	+	++	~	~	+	+	++	~	++/-
SO17: 'Reducing waste'	~	~	+	~	+	+	~	~	~	+	0

IIA Objectives	Building a Fairer Newham	Social Infrastructure	Design	Green and Water Spaces	Economy	High Street	Homes	Climate Change	Transport	Waste and Utilities	Neighbourhood polices
SO18: 'Community facilities'	+	++	+	+	~	+	+	~	++	+	++
SO19: 'Inclusion'	+	++	+	++/?	+	+	++	~	+	+	++
SO20: 'Young people'	+	++	~	~	+	+	+	~	+	~	++
SO21: 'Reducing crime'	+	+	+	+	+	+	+	~	+	+	+
SO22: 'Health and wellbeing'	+	++	+	++/?	+	+	+	+	++	+	++

Summary of findings

3.2.2 The assessment found that significant positive effects were identified against all of the IIA objectives, except for SO17: 'Reducing waste' and SO21: 'Reducing crime', where either minor positive, neutral, or uncertain effects were identified.

3.2.3 Cumulatively, the draft Local Plan provides many opportunities for improving existing town centres within Newham, creating new employment opportunities, alongside new and accessible community facilities, open spaces, healthcare facilities and other development including new school and childcare facilities. The Local Plan also seeks to preserve elements of Newham's built environment that are important to its character and setting, make improvements to the housing stock and meet identified housing needs, whilst addressing the ongoing climate emergency, and ensuring that development in the borough is net-zero carbon. The Local Plan will utilise sustainable design, protect the existing natural resources of the borough whilst also ensuring waste is minimised, effective management of flood risk, utilise previously developed land and buildings, and protecting existing open/green spaces and/or provide new open spaces. The Local Plan will also deliver biodiversity net gain, create green infrastructure, encourage and actively support active and sustainable forms of travel, and provide opportunities for young people.

3.2.4 Significant negative effects were identified against the SO12: 'Flood Risk' and SO9: 'Climate change' objectives. as new development and associated activity will give rise to greenhouse gas emissions, including transport related emissions. The Local Plan requires development to be net zero carbon and seeks to promote more sustainable forms of transport and car free development, no additional mitigation is therefore suggested.

3.2.5 Overall, the HIA found that the Local Plan will have a positive effect on health and wellbeing through. The EqIA found that policies in the Local Plan which, while not focussed on people who share Protected Characteristics, could have significant positive effects. These include policies relating to the provision of a range of housing, employment (e.g. J1 'Employment and Growth', green infrastructure (e.g. GWS1 'Green spaces'), transport (e.g. T2 'Local Transport')

HRA

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

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

4. How the opinions expressed in response to the consultations have been taken into account

4.1 Key consultations and the responses received

4.1.1 Consultation with the public and the statutory SEA consultation bodies (the Environment Agency, Historic England and Natural England) has been an integral part of the IIA process and plan-making. The key consultation stages and dates are presented in **Table 4-1** below.

Table 4-1 Key consultations and dates

Local Plan	IIA
Issues and Options consultation held from 18 October to 17 December 2021	IIA Scoping Report consultation held from 18 October to 17 December 2021
Draft Local Plan Regulation 18 consultation held from 9 January to 20 February 2023	IIA Report consultation held from 9 January to 20 February 2023
Draft Submission Regulation 19 Local Plan consultation held from 17 July to 20 September 2024	IIA Report consultation held from 17 July to 20 September 2024
Main Modifications consultation held from 26 May to 7 July 2026	IIA Report Addendum consultation held from 26 May to 7 July 2026

4.2 How have the representations taken into account

4.2.1 Any responses received on the IIA Reports outlined in **Table 4-1** were reviewed and taken into account informing the subsequent stage. The representations received and how they were taken into account are presented in **Appendix B** of this Post Adoption Statement.

4.2.2 The Council produced the following reports that outline the responses received and how they have been taken into account through the Local Plan:

- Isses and Options Consultation Report (2021): https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/3
- Regulation 18 Consultation Report (2023): https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/2
- Regulation 22 Consultation Report: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/6
- Main Modifications Consultation Report (2026): https://www.newham.gov.uk/downloads/file/11235/lbn-local-plan-main-modifications-consultation-report-july-2026-1-

5. The reasons for choosing the Local Plan as adopted, in light of the reasonable alternatives

5.1 Identification and assessment of reasonable alternatives

5.1.1 The SEA Regulations require the identification and assessment of 'reasonable alternatives' to a plan. The assessment of reasonable alternatives does not need to include all possible alternatives, but only those that are realistic.

5.1.2 As per the SEA Regulations, the reasonable alternatives were considered to the same level of detail as the preferred option. Therefore, the assessment of alternatives was conducted using the same methodology applied to the assessment of the emerging Local Plan.

5.1.3 The IIA Report considered a range of alternatives and identified reasonable alternatives for the:

- Spatial strategy;
- Approach to planning for neighbourhoods;
- Quantum of Employment Land for Industrial Uses; and
- Thematic policies,

5.1.4 The rationale for the identification of alternatives and the assessment of reasonable alternatives is presented in Appendix E (Consideration of Reasonable Alternatives) of the IIA Report.

5.2 Outline reasons for the selection of the preferred approach and rejection of reasonable alternatives

5.2.1 Outline reasons for the selection and rejection of reasonable alternatives are provided in **Table 5-1** below.

Table 5-1 Outline reasons for selection and rejection of reasonable alternatives

Reasonable alternatives	Outline reasons for selection or rejection
Spatial Strategy	
Directing significant levels of growth to neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area, neighbourhoods along the River Lea which form part of the cross boundary Poplar Riverside Opportunity Area and to the Stratford and Maryland neighbourhood, supported by a redesigned Stratford Station, with incremental character-led intensification and change in other neighbourhoods. All 17 neighbourhoods to experience some degree of change, influenced by individual policies informed by the specific needs of that neighbourhood.	Preferred Approach - Consistent with the London Plan 2021 by following a design and character-led approach to where growth can be accommodated as well as the role of small sites in delivering incremental change. Ensures the benefits of growth are distributed across the borough in line with council objectives, both through new housing and through services and facilities as part of network of well-connected neighbourhoods.
Retain the Arc of Opportunity and Urban Newham. Arc of Opportunity is focus of job creation, infrastructure development, new town and local centres and vast majority of new housing. In Urban Newham there is incremental and small change focussed in town and local centres and Crossrail centres, based on 6 neighbourhoods.	Rejected - This would create a significant divide between areas of change and areas with no change in the borough. It would reduce the areas which would directly benefit from growth. It may reduce the quantity of housing and other development coming forward in the borough, as policies would be less enabling of growth on smaller sites.
Direct significant levels of growth at high density to all neighbourhoods.	Rejected - This would lead to significant heritage/local character impacts which would undermine the design-led approach in the London Plan 2021. Could also lead to loss of other priority land uses.
Direct significant levels of growth to Stratford as Metropolitan Centre and to Opportunity Areas only.	Rejected - This would create a significant divide between areas of change and areas with no change in the borough. It would reduce the areas which would directly benefit from growth. It may reduce the quantity of housing and other development coming forward in the borough, as policies would be less enabling of growth on smaller sites.
Approach to planning for a network of well-connected communities	
Creating a network of well-connected neighbourhoods which ensures all residents have access to community facilities, transport, employment opportunities and shops within easy reach of their homes. Through new district centre at Beckton Riverside, new and expanded local centres protecting and expanding the borough's network of neighbourhood parades and by directing these uses primarily to Town Centres, as well as allowing smaller facilities	Preferred approach - Evidence in the Retail and Leisure Centre on how the town centre hierarchy is performing and analysis of where gaps exist for town centre uses and community facilities as part of the neighbourhood network. Better reflection of the existing spatial distribution of community facilities and resident feedback that they play a valued role outside of Town Centres. Commitment to delivering the Council's objective for residents to live in a network of well-connected neighbourhoods. Still ensures a

Reasonable alternatives	Outline reasons for selection or rejection
to be located in a wider range of locations to reduce gaps in the neighbourhood network.	balance with protecting the vitality of Town Centres and limiting highways and amenity impacts.
Maintain town centre first approach without looking to fill the gaps in the neighbourhood network.	Rejected - May improve the vitality and viability of existing Town Centres but would reduce access to and choice of facilities for residents in some of the borough and may reduce viability for smaller shops or community facilities who can't afford Town Centre locations.
No restrictions on scale or location of these uses (retail and community uses) outside of designated centres to fill all gaps in the network of well-connected neighbourhoods.	Rejected - This option may run counter to the NPPF. It would harm the viability and vitality of existing Centres as part of the Town Centre first approach. It may also increase amenity / neighbourliness conflicts between uses and may increase use of unsustainable transport to reach less accessible locations.
Quantum of employment land for industrial uses	
Plan for 335,000 sqm of new industrial floorspace	Preferred approach - Economic evidence recommends planning for 335,000 sqm (approximately 51ha) of industrial to avoid constraining growth, maximise employment opportunities for residents and contribute to meeting the industrial needs including the wider property market areas i.e. the Central Activity Zone. The higher figure aligns with the market view of industrial demand and the need to take a positive approach of land for economic growth. This target is based on past (2009-19) jobs delivery trends. The Employment Land Review 2022 recommends planning for this figure.
Plan for 127,000 sqm of new industrial floorspace	Rejected - This level of provision would potentially restrict economic growth, in particular industrial growth (for which there is significant positive demand) which would affect Newham (and due to Newham's location and role) London's economy. The Employment Land Review 2022 suggests that failing to make sufficient provision for employment could lead to the relocation of industrial land further and further out of London generating more and more negative sustainability impacts.
Plan for 197,000 sqm of new industrial floorspace.	Rejected - This level of provision would potentially restrict economic growth, in particular industrial growth (for which there is significant positive demand) which would affect Newham (and due to Newham's location and role) London's economy. The Employment Land Review 2022 suggests that failing to make sufficient provision for employment could lead to the relocation of industrial land further and further out of London generating more and more negative sustainability impacts.

Reasonable alternatives	Outline reasons for selection or rejection
Thematic policies	
Throughout the course of developing the Local Plan, officers identified various options for each of the policy themes that the Local Plan considers, some of these are very detailed in nature. In the majority of instances, it was concluded that the options did not need to be treated as reasonable alternatives. However, reasonable alternatives were identified and assessed for the following policies: • Policy D3: Design-led site capacity optimisation; • Policy HS5: Visitor Evening and Night Time Economy; • Policy SI2: New and re-provided community facilities and health care facilities; • Policy J4: Community Wealth Building and Inclusive Growth; • Policy H2: Protecting and Improving Existing Housing; • Policy H6: Supported and Specialist Housing; • Policy H8: Purpose Built Student Accommodation; • Policy H9: Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living; • Policy H11: Housing Design Quality; Policy GWS5: Play and informal recreation for all ages; • Policy CE2: Zero Carbon Development	The IIA found that none of the identified reasonable alternatives performed better than the proposed approach against the IIA framework. For this reason, the preferred approach was selected and the reasonable alternatives rejected by the Council.

6. Measures that are to be taken to monitor the significant environmental effects

6.1 Monitoring the effects of the Local Plan

6.1.1 The SEA Regulations require that the significant environmental effects of plans and programmes be monitored. Monitoring the effects of the Local Plan's implementation can help to answer questions such as:

- Were the IIA predictions of effects accurate?
- Is the Local Plan contributing to the achievement of the IIA objectives?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

6.1.2 To achieve this, the IIA objectives have been linked to key performance indicators set out in the adopted Local Plan **Table 6-1** below.

Table 6-1 IIA objectives and key performance indicators

IIA objective	Key performance indicators
SO1: Promote diverse and economically thriving town centres.	• Delivery of new town centres, local centres and neighbourhood parades; • Town and local centre health check; • Satisfaction with local shopping facilities; and • Net provision of Community Facilities.
SO2: Ensure that neighbourhoods are liveable, safe, high quality with good accessibility to retail, leisure, culture, healthcare, education and open space.	• Social Value-Health Impact Assessments received; • Delivery of new town centres, local centres and neighbourhood parades; • Town and local centre health check; and • Net provision of Community Facilities.
SO3: Maintain local distinctiveness and protect and enhance place-making assets.	• Number and location of major development requiring fieldwork investigations; and • Change to the Heritage at Risk Register (published by Historic England).

IIA objective	Key performance indicators
SO4: Encourage growth of local businesses, attract inward investment and increase employment	• Delivery of new town centres, local centres and neighbourhood parades; • Town and local centre health check; • Satisfaction with local shopping facilities; • Number and location of visitor accommodation bed spaces approved; and • Net provision of Community Facilities.
SO5: Ensure that economic benefits are retained within the borough following Community Wealth Building principles	• Delivery of new town centres, local centres and neighbourhood parades; • Town and local centre health check; • Satisfaction with local shopping facilities; • Number and location of visitor accommodation bed spaces approved; and • Net provision of Community Facilities.
SO6: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	• Net provision of Community Facilities.
SO7: Improve the existing housing stock in the borough	• Planning obligations supporting delivery of Local Plan; • Housing target met; and • Protection of housing stock.
SO8: Increase the supply of housing, choice and quality of affordable housing in the borough	• Planning obligations supporting delivery of Local Plan; • Housing target met; • Protection of housing stock; • Delivery of affordable housing; • Housing mix; • Delivery of older persons housing; • Delivery of Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living developments, including the delivery of Houses in Multiple Occupation that meet the housing needs of Newham Care Leavers or homeless single people in Newham; • Delivery of Gypsy and Traveller accommodation; • Delivery of wheelchair dwellings and number of people waiting for a wheelchair adapted dwelling; and • Delivery of site allocations.
SO9: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	• Number of developers taking up water efficiency incentives; • Delivering net zero buildings;

IIA objective	Key performance indicators
	• Developments meeting embodied carbon target of less than 500kg CO2/m$^{2;}$ • Number of developments needing to provide detailed Overheating Assessments; and • Number of developments supported by a Retrofit Plan.
SO10: Ensuring high standards of sustainable design are achieved in the built environment.	• Newham Design Review Panel (and Community/Youth Panel) activity; • Location and scale of tall buildings; and • Delivering net zero buildings.
SO11: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.	• Publicly accessible open space losses and gains; • Number of developers taking up water efficiency incentives; • Developments meeting embodied carbon target of less than 500kg CO2/m$^{2;}$ • Levels of PM2.5, PM10 and NO_x air quality in the borough; • Modal share in Newham; • Number of bike parking spaces approved in applications; and • Number of Electric Vehicle Charging Points.
SO12: Avoid, reduce and manage all forms of flood risk	• Flood risk management; and • Quantity of major developments achieving greenfield run-off standards.
SO13; Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	• Number and location of major development requiring fieldwork investigations; and • Number of contaminated sites in the borough.
SO14: Address existing open space deficiencies and improving existing green & blue infrastructure and open spaces.	• Number and location of major development requiring fieldwork investigations; • Publicly accessible open space losses and gains; • Allotment space provision; • Urban Greening Factor score of development; • Canopy cover; and • Net provision of play space.
SO15: Protect, enhance and increase biodiversity, habitats and species in the borough	• Number and location of major development requiring fieldwork investigations; • The amount of new floorspace for Biodiversity Net Gain; • Changes to areas of biodiversity importance; and • Canopy cover.
SO16: Create accessible, safe and sustainable connections and networks	• Delivery of new town centres, local centres and neighbourhood parades; • Modal share in Newham;

IIA objective	Key performance indicators
by walking, cycling, public transport and road.	• Number of bike parking spaces approved in applications; and • Number of Electric Vehicle Charging Points.
SO17: Reduce amount of waste sent to landfill and increase reuse, recycling, and recovery.	• Number of developments supported by a Retrofit Plan.
SO18: Provide quality community facilities and infrastructure in the right location for residents.	• Delivery of new town centres, local centres and neighbourhood parades; • Town and local centre health check; • Satisfaction with local shopping facilities; and • Net provision of Community Facilities.
SO19: Encourage greater community cohesion and reduce poverty, Racism, Inequality and Disproportionality.	• Placemaking satisfaction of people occupying new developments; and • Social Value-Health Impact Assessments received.
SO20: Improve and increase the facilities and opportunities for young people.	• Net provision of cultural and sport and recreation facilities; • Net provision of play space; and • Delivery of purpose built student accommodation bed spaces across the plan period.
SO21: Contribute towards reducing crime and the fear of crime.	• Placemaking satisfaction of people occupying new developments; and • Social Value-Health Impact Assessments received.
SO22: Improve the health and wellbeing of the population and reduce health inequalities.	• Social Value-Health Impact Assessments received; • Net provision of cultural and sport and recreation facilities; • Net provision of play space; and • Number of bike parking spaces approved in applications.

Appendices

Appendix A – SEA Compliance

Table A-1 details the SEA Regulations' requirements of the Post Adoption Procedures and indicates where relevant information required can be found in this report.

Table A-1 Compliance of this report with the SEA Regulations requirements

SEA Regulations Requirements	Location in the Post Adoption Statement (where appropriate)
Information as to adoption of plan or programme (SEA regulation 16) (1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall - (a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and (b) take such steps as it considers appropriate to bring to the attention of the public (i) the title of the plan or programme; and (ii) the date on which it was adopted.	A copy of the final Local Plan and accompanying reports, and documentation will be made available.
(2) As soon as reasonably practicable after the adoption of a plan or programme – (a) the responsible authority shall inform— (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of State, the Secretary of State; And (b) the Secretary of State shall inform the Member State with which consultations in relation to the matters referred to in paragraph 3. (3) The matters are – (a) that the plan or programme has been adopted; (b) the date on which it was adopted; and (c) the address (which may include a website) at which a copy of— (i) the plan or programme, as adopted, (ii) its accompanying environmental report, and (iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.	A copy of the final Local Plan and accompanying reports, and documentation will be made available. This Post Adoption Statement addresses 3(iii) and contains particulars specified in paragraph (4) as outlined below.
(4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are –	**Section 2**

SEA Regulations Requirements	Location in the Post Adoption Statement (where appropriate)
(a) how environmental considerations have been integrated into the plan or programme;	
(b) how the environmental report has been taken into account;	**Section 3**
(c) how opinions expressed in response to – (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), - have been taken into account;	**Section 4** and **Appendix B**
(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;	Not applicable - no transboundary consultation with EU Member States took place.
(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and	**Section 5**
(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	**Section 6**
Monitoring of implementation of plans and programmes (SEA regulation 17) Content (1) The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.	Monitoring measures are set out in **Section 6**. The Council will identify effects and undertake remedial action (as necessary) as the Local Plan is implemented.
(2) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with paragraph (1).	The monitoring measures set out in **Section 6** will complement existing monitoring arrangements where possible.

Appendix B – Schedule of Consultation Responses

Comments on the Scoping Report

Respondent	Question / Reference	Comment	LBN response
r0li9px7nxwpdqqy8r0li9p3i4estjbn	Please provide any comments on the Sustainability Appraisal Scoping Report.	It's very dense and boring to read. Could it not have been set out more like the Issues and Options document (which was too long, but that's another matter) so it's more appealing and easy to follow?	Noted. The IIA is governed by legislative requirements which outline the types of information and data it has to assess. The IIA consultant will produce a executive summary written in plain English for the final report.
r0li9px7nxwpdqqy8r0li9p3i4estjbn	What other sources of data and evidence we should we consider?	I don't know. I couldn't easily find what data and evidence you considered in the first place.	The scoping report sets out where the variety of data has been collected from as part of each section.
r0li9px7nxwpdqqy8r0li9p3i4estjbn	Are there any equalities issues we have not identified?	I don't know.	Noted.
r0li9px7nxwpdqqy8r0li9p3i4estjbn	Are there any other health issues we have not identified?	I don't know what you mean by that. It could be interpreted in different ways. I tried searching on "health issue" in case you had defined it, but no.	The Health Impact Assessment baseline (pages 65-70) sets out health issues in the borough, supported by the Health and Wellbeing strategy evidence base.
r0li9px7nxwpdqqy8r0li9p3i4estjbn	Are there other prompt questions we should consider as part of the Equalities Impact Assessment framework?	I don't know what you mean.	The Equalities Impact Assessment has prompt questions that explain what the EQIA will be assessing, using the protected characteristics from the 2010 Equality Act. This is contained between pages 56-61

Respondent	Question / Reference	Comment	LBN response
r0li9px7nxwpdqqy8r0li9p3i4estjbn	Please provide any other comments on the Equalities Impact Assessment Scoping Report.	It's very dense and boring to read. Could it not have been set out more like the Issues and Options document (which was too long, but that's another matter) so it's more appealing and easy to follow?	Noted. The IIA is governed by legislative requirements which outline the types of information and data it has to assess. The IIA consultant will produce a executive summary written in plain English for the final report.
r0li9px7nxwpdqqy8r0li9p3i4estjbn	Please provide any other comments on the Health Impact Assessment Scoping Report.	It's very dense and boring to read. Could it not have been set out more like the Issues and Options document (which was too long, but that's another matter) so it's more appealing and easy to follow?	Noted. The IIA is governed by legislative requirements which outline the types of information and data it has to assess. The IIA consultant will produce a executive summary written in plain English for the final report.
r0li9px7nxwpdqqy8r0li9p3i4estjbn	Please state	What is the question? Is this the general comments section? If so then we need more equity. It's not about equality, it's about equity. For example, providing a gym so people can get fit only goes so far: what about the socio-economically disadvantaged who are less likely to be able to afford gym fees, and/or to have the time to make the return journey (if it's a 15-minute walk then that's an extra 30-minutes they need to find, compared to people who can just drive there), and/or to know about the various social media feeds that would tell them about the gym's existence and any special offers. It might not be possible to fit in more gyms, so how about installing more outdoor gyms so people can instantly see that they are nearby and obviously free to use? More community space both indoors and outdoors. People need more opportunities to meet, socialise, be active, discover interests, share knowledge/information/skills, and create social and support networks. The more connected a community is, the more we can help ourselves and each other without relying so much on local authority services.	Noted. The IIA is governed by legislative requirements which outline the types of information and data it has to assess. Equality is an important consideration in the appraisal and it is included as one of the Sustainability Objectives policies in the Plan will be assessed against. The wording of this Objective is: Improve the health and wellbeing of the population and reduce health inequalities. This objective includes a consideration of affordability where it would impact health inequalities.

Respondent	Question / Reference	Comment	LBN response
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	Encouraging of greener transport via public transport / walking / cycling by financially penalising car owners without considering individual circumstances(e.g. emergency services workers, those with disability or health conditions but yet not serious enough to justify a blue badge) is unhelpful.	Noted. Accessibility is an important consideration in the appraisal and it is included as one of the Sustainability Objectives policies in the Plan will be assessed against. The wording of this Objective is: Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road. Accessibility is about ensuring that those with different mobility needs are also able to travel around the borough.
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	Additionally the public transport options are extremely limited with many residential areas over 15 minute walk from a DLR station which are typically only every 8-10 minutes. Bus services are also infrequent, unreliable and tend to take extremely long routes e.g. Canning town by car 5 minutes, Canning town by bus 30 minutes. It does not appear Newham have pushed TFL for more frequent nor efficient routes and instead have potentially looked to reduce routes. Once crossrail opens a direct bus route to Custom House station would be of great benefit in encouraging residents of local areas who are put off by the long walk to commute into central London as currently this does not exist.	Noted. Public transport is an important consideration in the appraisal and it is included as one of the Sustainability Objectives policies in the Plan will be assessed against. The wording of this Objective is: Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road. Your comment regarding specific route requirements have been considered as part of feedback on the Local Plan Issues and Options document.

Respondent	Question / Reference	Comment	LBN response
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	Additionally, residents may wish to cycle or walk more but the safety issues in Beckton are often off-putting. Limited and elongated walking routes due to many dead end roads/ close layout of residential areas and lack of street lighting in 'cut throughs' alongside significant ASB that is constantly ignored by local government leaves many residents feeling unsafe to do so.	Noted. The quality of active travel provision is an important consideration in the appraisal and it is included as one of the Sustainability Objectives policies in the Plan will be assessed against. The wording of this Objective is: "Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road." Your comments regarding the street layout in Beckton have been considered as part of feedback on the Local Plan Issues and Options document.
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	There is also a significant bike theft issue in Beckton and the wider Newham area having had 2 locked up bikes stolen in less than 12 months 1 from outside of a train station and 1 from inside the secure bike storage within the underground residents only car park in our apartment block and an attempted theft at Gallions Reach retail park	Noted. The quality of active travel provision and crime are important considerations in the appraisal and they are included as two of the Sustainability Objectives policies in the Plan will be assessed against. The wording of these Objective is: "Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road." and "Contribute towards reducing crime and the fear of crime" The policies in the Local Plan will be assessed against these objectives. Your comments regarding cycle theft and need for improved cycle parking have been considered as part of feedback on the Local Plan Issues and Options document.

Respondent	Question / Reference	Comment	LBN response
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	Dealing with bike thefts and providing SECURE bike storage (even at a cost where people pay for access and are provided a code for example) in key locations such as high streets, retail parks and at DLR / Tube stations would further encourage people to cycle to these locations without fear of their property being stolen.	Noted. The quality of active travel provision and crime are important considerations in the appraisal and they are included as two of the Sustainability Objectives policies in the Plan will be assessed against. The wording of these Objectives are: "Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road." and "Contribute towards reducing crime and the fear of crime" The policies in the Local Plan will be assessed against these objectives. Your comments regarding cycle theft and need for improved cycle parking have been considered as part of feedback on the Local Plan Issues and Options document.
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	I notice the proposal mentions cycle routes which could do with being more frequent and better lit with patrols for ASB but all of this is redundant if bikes are not safe to be left at your end destination as people will only then use them for leisurely bicycle rides as opposed to as a means of actual transport which is what would really be of impact to the environment.	Noted. The quality of active travel provision and crime are important considerations in the appraisal and they are included as two of the Sustainability Objectives policies in the Plan will be assessed against. The wording of these Objective is: "Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road." and "Contribute towards reducing crime and the fear of crime" The policies in the Local Plan will be assessed against these objectives. Your comments regarding cycle theft and need for improved cycle parking as well as improved lighting on cycle routes have been considered as part of feedback on the Local Plan Issues and Options document.

Respondent	Question / Reference	Comment	LBN response
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	I have noticed the plan discussed wanting new businesses to come to the area and I have noticed unfortunately in many areas of Newham the profile of businesses (aside from supermarkets) is either retail (mainly standard high street brands as opposed to local businesses), betting shops, fast food takeaways and convenience stores.	Noted. Quality and variety of local businesses is an important consideration in the appraisal and it is included as two of the Sustainability Objectives policies in the Plan will be assessed against. The wording of these Objectives are "Promote diverse and economically thriving town centres" and "Encourage growth of local businesses, attract inward investment and increase employment" Your comments regarding retail variety, hot food takeaways and the growth in new businesses have been considered as part of feedback on the Local Plan Issues and Options document.
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	There is very little hospitality and leisure in Newham with few cafes, bars and restaurants outside of the Excel area which are generally a sign of a more prosperous area and attract people from outside of the immediate area	The quality of neighbourhoods is an important consideration in the appraisal and it is included as one of the Sustainability Objectives policies in the Plan will be assessed against. The wording of this Objective is: "Ensure that neighbourhoods are liveable, safe, high quality with good accessibility to retail, leisure, culture, healthcare, education and open space". The Local Plan policies will be assessed against the objectives. Your comments regarding the need for places to eat and drink have been considered as part of feedback on the Local Plan Issues and Options document.

Respondent	Question / Reference	Comment	LBN response
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	. I notice several disused structures in the various parks which would be ideal for a cafe / small restaurant but yet they remain empty, dilapidated and an eyesore. If even one of these was turned into a cafe with an incentivised rent to a local person for example it would not only provide opportunity for a new business and employment of other residents, it would also improve the parks appearance and act as a place to bring residents together.	The quality of parks and local businesses are important considerations in the appraisal and they are included as two of the Sustainability Objectives policies in the Plan will be assessed against. The wording of these Objective are: "improving existing green & blue infrastructure and open spaces" and "Encourage growth of local businesses, attract inward investment and increase employment". The Local Plan policies will be assessed against the objectives. Your comments regarding the opportunity to improve facilities in parks have been considered as part of feedback on the Local Plan Issues and Options document.
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	Further to the above on the topics of green space Newham council has recently made the decision to shut Beckton farm despite no public engagement and significant concerns raised and a highly signed petition. The farm and the centre it contained were not only a highlight of the area and very important to parents and schools particularly for vulnerable or low income families and those with SENs for whom they provided an experience both beneficial to educational and health they also acted as a hub for the community and if it would have been properly publicised and better treated it would have no doubt attracted visitors from outside the immediate local community. It is a disastrous outcome that the farm, which could have achieved many of the objectives that the sorts of initiatives this 'Local Plan' looks to achieve (improving health, education, green space, things for children, things for disabled, safe spaces etc.), was	The quality of parks and community facilities are important considerations in the appraisal and they are included as two of the Sustainability Objectives. The wording of these Objectives are "improve existing green & blue infrastructure and open spaces" and "Provide quality community facilities and infrastructure in the right location for residents". The Local Plan policies will be assessed against the objectives. Concerns regarding the closure and future of Newham City Farm have also been considered as part of feedback on the Local Plan Issues and Options document.

Respondent	Question / Reference	Comment	LBN response
		closed despite public outcry against this and without any meaningful engagement.	
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	The council clearly does not look to practice what it preaches as this was a clear example of the PEOPLE of Newham NOT being at the heart of what you do. You would rather plug excessive amounts into lengthy consultations on new initiatives than to look at what you have and how to improve that to be of greater benefit. The farm may have not been in the best shape, as was mandated to close during COVID and had lacked investment funding from the council or other sources but instead of trying to polish up this potential diamond of a local resource the council instead closes it to fit its own agenda.	The quality of parks and community facilities are important considerations in the appraisal and they are included as two of the Sustainability Objectives that policies in the Plan will be assessed against. The wording of these Objectives are " improving existing green & blue infrastructure and open spaces" and "Provide quality community facilities and infrastructure in the right location for residents". Concerns regarding the closure and future of Newham City Farm have also been considered as part of feedback on the Local Plan Issues and Options document.

Respondent	Question / Reference	Comment	LBN response
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	Crime in the area is also much worse than expected in the area with theft, fly tipping, ASB, drugs, drinking and general lack of respect being major issues. The council and the stretched police service seem to be unable or unwilling to actually put resources in to solve these issues. There are clear segments of the community who have no respect for their neighbours nor the local area who continue to aggressively beg, fly tip, litter, urinate in public, thieve, drink/use drugs in public, drive dangerously, park illegally (list goes on) but yet Newham does nothing. There is significant amounts of CCTV in the area yet it does not seem to be any sort of deterrent nor does it appear to be used to catch those responsible and actually hold them accountable for this criminal activity.	Noted. Reducing crime and the fear of crime is an important consideration in the appraisal and it is included as one of the Sustainability Objectives which policies in the Plan will be assessed against. The wording of this Objective is "Contribute towards reducing crime and the fear of crime". Comments regarding CCTV an crime have also been considered as part of feedback on the Local Plan Issues and Options document.
70bbd4algdgbrosjxzw470bbmfsjnck4	Please provide any comments on the Sustainability Appraisal Scoping Report.	Newham also lacks many of the events that other areas host that bring others into the area and has recently gone so far as to cancel those few events that we previously had such as bonfire night fireworks. These events bring people into the borough who then spend income here as well as bringing the existing community together for something positive."	Noted. Community cohesion is an important consideration in the appraisal and it is included as one of the Sustainability Objectives that policies in the Plan will be assessed against. The wording of this Objective is "Encourage greater community cohesion". The need for more events and opportunities to bring people together has also been considered as part of feedback on the Local Plan Issues and Options document.

Respondent	Question / Reference	Comment	LBN response
70bbd4algdgbrosjxzw470bbmfsjnck4	What other sources of data and evidence we should we consider?	Statistics can be manipulated and misleading and at a Borough level may hide differences across the areas. Spending time with residents and actually going to different areas (particularly at night) may help the council actually see the issues of Newham through the eyes of residents and better understand what their priorities are rather than focussing on London wide objectives that may be all well and good for the more affluent areas of the city but when Newham hasn't even got the basics right in terms of crime, housing etc. how can it be that you are trying to solve an issue like the environment instead of blue sky thinking that may help future generations (which is admirable) how about focussing on how you can make a difference to the day to day of CURRENT residents otherwise you will continue to have high turnover of residents where those who are able to as a result of having secure employment and the resources to do so will continue to leave the borough and it will never be able to succeed and will continue to have high levels of unemployment, benefits reliance and crime indefinitely.	Noted. Data regarding crime, housing as well as the perception of these by residents is contained within the baseline report on page 16.

Respondent	Question / Reference	Comment	LBN response
70bbd4algdgbrosjxzw470bbmfsjnck4	Are there any equalities issues we have not identified?	You identify the different equalities but do not look to address how the intersections of the community can be better brought together through the future plans. Hospitality businesses, places of leisure and events are all key to this	Noted. Equality and intersectionality is an important consideration in the appraisal and it is included as one of the Sustainability Objectives policies in the Plan will be assessed against. The wording of this Objective is "Encourage greater community cohesion and reduce poverty, Racism, Inequality and Disproportionality". The need for more events and opportunities to bring people together has also been considered as part of feedback on the Local Plan Issues and Options document.
Environment Agency	N/A	In reference to the sustainability objective: 'Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste'. This objective should be expanded to consider groundwater. A key prompt question here could be "Will the policy be protective of groundwater and improve groundwater quality?" The "protective of groundwater" wording of this prompt ensures both groundwater quality and quantity issues are considered. Development should not be a detriment to groundwater flow or quantity, nor should it be a detriment to groundwater quality. A broad indicator for groundwater quality is the Water Framework Directive Groundwater water bodies. It is noted that there is one such body in Newham – the Greenwich Tertiaries and Chalk (GB40602G602500), which currently has a "poor" Water Framework Directive Cycle 2 overall classification.	We will expand the objective prompt questions to consider groundwater, as suggested.

Respondent	Question / Reference	Comment	LBN response
Environment Agency	5.A2 Collecting Baseline information	All the topics within our remit are listed (paragraphs 5.19 – 5.29), with relevant facts taken from the evidence listed. In regard to 5.29 Flood Risk, we would expect to see Table 2: Key Sources of baseline information to reference Greater London Authority, Regional Flood Risk Assessment 2018. This contains general information, and specific information on flood risk in the Royal Docks OA. Table 2 might also usefully reference the TE2100 Plan. Table 2 could also make use of the resources earlier recommended for the interactive policy map (see additional comments below).	We will add the points and baseline information that you suggest.
Environment Agency	6.A3 Identifying Local Sustainability Issues	In reference to Table 3: Sustainability issues and problems, we suggest adding to the bullet point in bold; · Continued flood risk from the sea, rivers and surface water	We will expand the objective prompt questions to consider flood risk from the sea, rivers and surface water, as suggested.
Environment Agency	7.A4 Developing the IIA framework	Table 5. Sets IIA objectives, prompt questions, and indicators. Under 'Ensure sustainable use and protection of natural resources, including water', an indicator reads 'Reduction in the amount of water used in a building'. This broad indicator is impractical to measure and monitor at Local Plan scale. We recommend you consider referring to the number of new builds approved that meet London Plan targets, and to number of existing buildings retrofitted with efficiency measures as a result of planning / building regulations approval.	We will modify the indicator as suggested, to ensure that it can be monitored adequately.

Respondent	Question / Reference	Comment	LBN response
Environment Agency	Table 6 Compatibility of IIA Objectives	Indicator 14 'Address existing open space deficiencies and improving existing green and blue infrastructure and open spaces.' Why is this shown as 'incompatible' with Indicators 4. 'Encourage growth of local businesses…', and 8. 'Increase supply of housing.'? Investment in businesses, employment and housing may well generate investment in open spaces, and green / blue infrastructure. e.g. SUDs schemes incorporated in development will provide opportunities for green / blue infrastructure, and for Indicator 15. Biodiversity.	We consider that these indicators may be incompatible due to limitations on how many ways land can be used. For example, a piece of brownfield land could become a new park in an area of open space deficiencies - or it could become a new housing site or a commercial development. As you correctly point out, it may be the case that these developments lead to improvements to indicator 14. These trade-offs have to be considered across the Plan.
Monega Association		We welcome any simplification of the Planning system, which can be bewildering to anyone other than property consultants and Council planning officers.	Noted.
Monega Association	2.1	There is a widely held understanding that the term 'sustainability' relates purely to climate change type matters, methods to address it. There seems to be a different and wider definition on this word growing.	Sustainability has a specific meaning in this context - a sustainability appraisal is an appraisal of the economic, environmental, and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.
Monega Association	2.6	Who inputs Health Impact Assessments into planning responses ? Local communities may have clear views on a local issue and would like to know to whom they might turn for help and support. Instance : Our local Pharmacy was twice refused planning permission to improve its premises, and helpfully told it might like to move out of the neighbourhood if it wanted to offer better facilities. An unbelievable response from Planning. That's hardly meeting the aspiration of health and wellbeing in the community.	Noted. HIA's are submitted as part of planning applications by the applicant, and should be consulted on with local residents and stakeholders before submission.

Respondent	Question / Reference	Comment	LBN response
Monega Association	2.9	Why is the habitat regulation assessment limited to European significance. A local landmark tree, for instance, under threat by a property developer, falls well out of this definition. A simple tree will support wildlife of some kind.	Noted. An HRA is guided by legislation and is proportionate to the type of plan/proposal it is assessing.
Monega Association	4	We could find no Appendix 1 in the Report (unless it was table 2 ?) therefore we can only suggest that any Resident's Association's Annual Report might be worthy of voluntary inclusion, or even a Report tailored to planning matters each year.	Noted. As with this scoping report, any future scoping report will be consulted on, residents will be able to suggest additional data. Data will need to be of a suitable quality and scale to meet the regulatory requirements of a sustainability appraisal.
Monega Association	5.1	Who measures Baseline Information ? If there is an active Resident's Association in any area then they should be consulted	Noted. Each section has a source and the appendix details where data has been sourced for (page 20).

Respondent	Question / Reference	Comment	LBN response
Monega Association	5.21	There is no mention of publicly assessible but privately owned open spaces ? A restaurant courtyard, for instance housing a feature tree, is readilly accessible during opening hours yet has no ‘protection’ despite being a community asset.	The quality of open space and biodiversity is an important consideration in the appraisal and it is included as one of the Sustainability Objectives which policies in the Plan will be assessed against. The wording of this Objective is: "Protect, enhance and increase biodiversity, habitats and species in the borough" The sustainability objectives have to be broad enough to be used to assess and appraise policies in the Local Plan, and it would not be appropriate to mention specific types of open space/tree locations. The Local Plan will address open space deficiencies, and how existing green and blue infrastructure and open spaces can be improved. As above, the IIA will assess this. Your comments regarding trees in a range of locations and open space have been considered as part of feedback on the Local Plan Issues and Options document.

Respondent	Question / Reference	Comment	LBN response
Monega Association	5.26	Figures on car ownership continue to be mis-interpreted. That simple figure does not take into account the type of housing locally (high rise with little parking provision) as against terraced streets where many homes will have a vehicle. One evening look down a terraced street locally and there will be about 90+ space take-up. We have seen this figure of 52% used on a local planning arguement when the figure bares no relation to local circumstances.	The quality of transport in the borough is an important consideration in the appraisal and it is included as one of the Sustainability Objectives which policies in the Plan will be assessed against. The wording of this Objective is "Create accessible, safe and sustainable connections and networks by walking, cycling, public transport and road." The sustainability objectives have to be broad enough to be used to assess and appraise policies in the Local Plan, and rely on borough wide data. Individual planning applications will often be supported by more local parking assessments. Concerns about parking and other transport issues have been considered as part of feedback on the Local Plan Issues and Options document.
Monega Association	5.27	Are local memorials taken into account, i.e. war memorials listed by the Imperial War Museum. Locally there is one such, yet it may well be swept away by a property developer despite only having been established two years ago. How can protection be strengtherned. This relates to maintaining local distinctiveness and cultural importance.	The sustainability objectives have to be broad enough to be used to assess and appraise policies in the Local Plan, and rely on boroughwide data. This means protection of an individual war memorial would be out of scope of a IIA written for a Local Plan Review. However data on listed heritage assets have been considered and heritage and cultural importance is an important consideration in the appraisal and two of the sustainability objectives policies in the plan will be assessed against is: "Maintain local distinctiveness and protect and enhance place-making assets."

Respondent	Question / Reference	Comment	LBN response
Monega Association	6	Table 3. Local neighbourhood retail areas should be a major 'sustainability' issue. Town Centres are different. Much damage has been done to local communities by the current interpretation of the Local Plan in that such areas might/should be sacrificed to 'support' high streets even though this is shortsighted and against local resident interests. Instance. There are three shops currently empty along Katherine Road, each blighted by planning refusals, supposedly undermined by the Local Plan. This goes to the heart of the aspiration of neighbourhoods which are 'liveable, safe, high quality with good accessibility to retail…….etc etc'.	The quality of neighbourhoods is an important consideration in the appraisal and it is included as one of the Sustainability Objectives that policies in the Plan will be assessed against. The wording of this Objective is: "Promote diverse and economically thriving town centres." and "Ensure that neighbourhoods are liveable, safe, high quality with good accessibility to retail, leisure, culture, healthcare, education and open space". Specific comments on different centres have been considered as part of feedback on the Local Plan Issues and Options document.
Monega Association	6	Reducing crime and fear of crime is something very important, but too often there is a disconnect bewtween police and community. Instance. Despite a petition of over seventy signatures, a letter of support from a member of the Police panel, and desperate messages for support from this RA to the local police, there was a refusal to meet, and no willingness to support the community on a particular planning issue. There is very little mention of police accountability to RA's in the document.	Reducing crime and the fear of crime is an important consideration in the appraisal and it is included as one of the Sustainability Objectives which policies in the Plan will be assessed against. The wording of this Objective is: Contribute towards reducing crime and the fear of crime. The policies in the Local Plan will be assessed against these objectives. These issues regarding crime and fear of crime have been considered as part of feedback on the Local Plan Issues and Options document.

Respondent	Question / Reference	Comment	LBN response
Monega Association		It is an ingoing mystery why there is no requirement to install solar panels onto the roofs of all new loft and kitchen extensions. Can this never be a straightforward environmental gain ?	Noted. This is more relevant to the Local Plan Issues and Options rather than the IIA and these issues have been considered as part of feedback on the Local Plan Issues and Options document. The IIA objectives note these issues as an important consideration however. The wording of the relevant Objective are: "Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change" and "Ensuring high standards of sustainable design are achieved in the built environment" The Local Plan (and the planning system more generally) has little power to mandate retrofit features like solar panels on 'permitted development' work, as this work doesn't require planning permission. The Climate Change policies in the Plan will encourage this and other measures however.
Monega Association		Pillar 2 in the 'Heart of Everything We Do' singles out the long term wellbeing of residents under 25. Where is over 65 in this ? They are the physically vulnerable, reliant on pension, and in the main the pillars of local communities.	The health of all residents is an important consideration in the appraisal and it is included as one of the Sustainability Objectives policies in the Plan will be assessed against. The wording of this Objective is "Improve the health and wellbeing of the population and reduce health inequalities"

Respondent	Question / Reference	Comment	LBN response
Monega Association		Reducing ‘digital exclusion’ is most welcome. However, for this to be anything other than condescending it should not be ‘free lessons in working computers’ but must make the availability of printed materials much easier. This document alone is 85 pages, the Community Involvement document is 32 pages, and the Local Plan count for youself. There must be better availability of printed Plans and Policies. Hard copies should be available on borrow terms from Libraries as you would borrow any book. This is a crucial y way of facilitating greater participation.	Noted. The Local Plan and other documents are available in local libraries, and the Statement of Community Involvement discusses the availability of printed materials and digital exclusion - with options like having planning officers send residents documents.
Monega Association		These comments may be not entirely appropriate for the type of feedback you are seeking but we trust you appreciate the effort to respond.	Noted, and thanks

Comments on the IIA Report – Regulation 18 Stage

Respondent	Question / Reference	Comment	LBN response
Environment Agency	Water quality 3.20	In reference to 3.20 Water quality on page 52, we recommend reference is made to the Water Framework Directive (WFD). The status of Newham's main rivers should be considered in reference to the current WFD management cycle.	Reference to the WFD and status of main rivers added to the IIA Report.
Environment Agency	Water use 2.23	Under 2.23 Water use on page 54, it should be noted that Newham is located in an area of serious water stress, as identified by the Environment Agency's Water stressed areas - final classification. We recommend that water resources are more clearly be identified in the Local Plan as a challenge and opportunity.	Reference to Newham being a water stressed area added to the IIA Report. Policy CE1 in the Regulation 19 draft Local Plan and supporting text highlight the need to address water scarcity and the Thames Water Region's designation as an area of serious water stress.
Environment Agency	Contaminated land 3.23	In reference to 3.26 Contaminated land on pages 55 and 56, we are pleased to see Newham's legacy of contaminated land and water pollution is recognised in the IIA. As previously mentioned in the response in relation to Policy CE1, LBN's Contamination Land Strategy was published in 2003. The IIA should consider whether this evidence base is still up-to-date and whether additional research is needed to better understand Newham's environmental constraints.	Comment noted. The Contaminated Land Strategy was updated in 2023 and is available on line.
Environment Agency		3.27 Flood risk In reference to 3.27.1. on page 56, whilst there is minimal fluvial flooding in the defended scenario, it is not correct to say there is no risk. Sites located within Flood Zone 3 and within the tidal breach flood extent are protected to a very high standard by the Thames tidal flood defences (up to a 1	Text amended as suggested.

Respondent	Question / Reference	Comment	LBN response
		in 1000 chance in any year flood event), yet these sites would be at risk if there was to be a breach in the defences. However, there are locations within the borough that are within flood zones and are not within areas that benefit from flood defences. Therefore, not all flood risk is residual only as stated in paragraph 3.27.1. Paragraph 3.27.3., should also reference to the risk of flooding from groundwater.	
Environment Agency	Key sustainability issues	In reference to Table 3.1 Identified Key Sustainability Issues, issue 21. Continued flood risk from rivers and surface water should be improved: '21. Increased flood risk from rivers, sea, surface water and groundwater'.	Table 3.1 updated.
Environment Agency	Key sustainability issues	Several key sustainability issues, discussed in the draft Local Plan, are missing from the table, such as water efficiency; water quality; and the vulnerability of groundwater from building on previously contaminated land.	Table 3.1 updated.
Environment Agency	Table 4.1. Sustainability objectives	We are pleased to see the inclusion of the following Sustainability Objectives: SO9 Climate change; SO10 Sustainable design; SO11 Natural resources; SO12 Flood risk; SO13 Land quality; SO14 B GBI; SO14 GBI; SO15 Biodiversity; and SO17 Waste.	Noted.
Environment Agency	Table 4.1. Sustainability objectives	SO13 is to improve land quality and ensure mitigation of adverse effects of contaminated land on human health. This objective this should be expanded to include groundwater vulnerability: 'mitigation of adverse effects on contaminated land on human health and controlled waters.'	Effects on controlled waters is considered through SO11 (our emphasis): *"Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste."*

Respondent	Question / Reference	Comment	LBN response
Environment Agency	Summary of Significant Effects	We agree with the Green and Blue Spaces – Summary of Significant Effects (p.103); the Climate Change – Summary of Significant Effects (p.104); and the Waste and Utilities – Summary of Significant Effects (p.106).	Noted.
Environment Agency	6.2. Key Conclusions Emerging from the Appraisal and Plan Making Process	We support the commitment to protecting and enhancing green and blue infrastructure, as well as support the point about sustainably managing resources, including waste. We also note that flood risk is mentioned in the context of mitigating climate change.	Noted.
Environment Agency	6.2.10 flood risk	In reference to 6.2.10, we are pleased to see the potential significant negative effects in regard to flood risk are highlighted. It is stated that the 'need to strengthen existing flood defences is recognised in the Local Plan and no additional mitigation is suggested' (page 171). We understand this to be grounds for why the Local Plan must take a very strong stance and have a robust flood risk policy, and we encourage that our recommendations for strengthening draft Policy CE7 Managing flood risk are taken into consideration.	Noted. Policy CE7 has been amended in response to the comments.
Historic England	5.7. SA of Neighbourhood Policies	We wouldn't disagree with the majority of the IIA report, including its assessment of likely effects of most of the draft policies set out in the consultation version of the Plan. Where we would disagree is in the assessments of the effects on the Stratford & Maryland and Forest Gate neighbourhoods – simply noting the presence of the right kind of terminology in policies relating to the historic environment takes no account of the very broad spatial extent of the site allocations (in the case of Stratford & Maryland) in or nearby the area, or the potential for height of development to	The IIA recognises the uncertainties at this stage. The IIA will continue to note instances where policies are considered to identify relevant heritage considerations because such provision should have a role in highlighting the need for proposals to avoid or mitigate any potential significant effects.

Respondent	Question / Reference	Comment	LBN response
		affect heritage significance (in the case of both). So a significant positive effect can be justified here. Similar comments apply in relation to the assessment of site allocations.	

Comments on the IIA Report – Regulation 19 Stage

Respondent	Question / Reference	Comment	LBN response
Environment Agency	3.26 Contaminated Land	In our Reg 18 response regarding section 3.26 on Contaminated Land we said that 'LBN's Contamination Land Strategy was published in 2003. The IIA should consider whether this evidence base is still up-to-date and whether additional research is needed to better understand Newham's environmental constraints. It doesn't look like there is any discussion regarding this however we note that a newer strategy titled 'London Borough of Newham: Contaminated Land Strategy (2023)' was referenced under policy CE1 however the 2003 version is still being referenced in section 3.26 of the document titled 'Newham Local Plan (Regulation 19) – Integrated Impact Assessment (Final Report)' prepared by WSP (dated: MAY 2024, ref: 62281192_P01.01).	Noted. This reference has been updated.
Environment Agency	3.27 Flood Risk	In our Reg 18 response regarding section 3.27 on Flood Risk we said that 'there are locations within the borough that are within flood zones and are not within areas that benefit from flood defences'. However the updated report referenced above still states that 'Thanks to formal flood defences (including the Thames Barrier) all properties in the borough are protected from tidal and fluvial flooding. This statement is incorrect as there are residential properties in undefended areas. We also said that this section should reference the risk of flooding from groundwater however it doesn't look like this has been done.	Noted. This section has been updated. Groundwater flood risk has been included in response to the comments.
Environment Agency	Table 4.1 Sustainability objectives	With regards to the Table 4.1 Sustainability Objectives we recommended that SO13 should be expanded to include groundwater vulnerability. The wording we suggested was 'mitigation of adverse effects on contaminated land on human health and controlled waters'. However it does appear that this has been taken onboard.	Effects on controlled waters is considered through SO11 (our emphasis): *"Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste."*
Natural England	HRA	Natural England welcome the positive approach to Epping Forest SAC mitigation that the council have had since the issues were identified in visitor surveys in 2017 and 2019. The Strategic Access Management and Monitoring (SAMM) Governance	Noted.

Respondent	Question / Reference	Comment	LBN response
		Agreement that has been adopted by Cabinet is a welcome first step in managing the impact of visitor numbers on Epping Forest SAC.	
Natural England	HRA Section 5.2	We note that point 5.2.8 in the HRA refers to the provision of Suitable Alternative Natural Greenspace (SANG) but appears unfinished. Our position remains that all development leading to a net increase in residential units within 6.2km of Epping Forest SAC should provide contributions to both SAMM and SANG and therefore at this stage we do not agree with the conclusion in paragraph 5.2.10. However, we note that policy GSW3 refers to the provision of both SAMM and SANG for new development which is in line with our position.	Noted. This section has been updated in response to the comments.
Natural England	HRA	We have had initial conversations with the council about approaches to SANG and possible locations for greenspace improvements in the borough (outside of those which are proposed elsewhere in the plan) and look forward to continuing these over the coming months. We will continue to support the council to develop a suitable SANG strategy that identifies proportionate mitigation options for new residential development coming forward within the 6.2km Zone of Influence in Newham.	Noted. HRA Report has been updated to reflect the current situation with regard to the SANG strategy.
Natural England	HRA Section 5.5	Natural England appreciate the work by Newham Council in modelling the potential air quality impacts of the plan on Epping Forest SAC, and we note the ongoing challenges of this work. Currently we are not able to agree with the conclusion that there will be no adverse effect on integrity of Epping Forest SAC as a result of air quality (paragraph 5.5.1). We look forward to continuing conversations with the council over these issues and would welcome the opportunity to discuss the modelling and results further as updates are made.	A report has been prepared by London Borough of Newham (*AIR QUALITY INFORMATION REPORT TO INFORM HABITATS REGULATIONS ASSESSMENT,* February 2025) to address this comment. Natural England provided written confirmation (dated 17th March 2025) that they are happy with the conclusions around AQ, and the recreation mitigation strategy. The HRA Report has been updated to reflect the updated evidence.

Comments on the IIA Report Addendum – Main Modifications

Respondent	Question / Reference	Comment	LBN Response
Gail De Souza	MMC-E-291	Concerned that modifications in ED030, when considered alongside the Integrated Impact Assessment Addendum (ED032), do not sufficiently demonstrate that infrastructure capacity is aligned with planned growth, including a range of social infrastructure, transport infrastructure, utilities and climate adaption infrastructure. Want infrastructure to be delivered in step with development rather than retrospectively.	This comment does not relate to a specific proposed Main Modification. The Local Plan is supported by a host of evidence base documents setting out the projected infrastructure requirements across the borough. This includes the Built Leisure Needs Assessment, the Green and Water Infrastructure Strategy, which also addresses climate resilience, the Strategic Flood Risk Assessment and the Sustainable Transport Strategy. The evidence of need has been developed in partnership with relevant public bodies involved in the delivery of infrastructure, including the Council's Pupil Place Planning team and the North East London Integrated Care Board. These collaborations are proactive and ongoing, as demonstrated though the Duty to Cooperate reports supporting the Local Plan (SD051, SD052, EWS001). Newham is committed to delivering the necessary infrastructure to support growth, as highlighted by the neighbourhood and thematic policies, as read together. The Local Plan is also supported by an Infrastructure Delivery Plan (EB004), which summarises the evidence base and provides further information on expected funding streams and delivery timescales, where these are known in coordination with relevant public bodies. Further guidance on infrastructure delivery will be provided following adoption, primarily through updates to the Infrastructure Delivery Plan that will include updates from infrastructure delivery partners. The Newham Local Plan (Regulation 22) – Integrated Impact Assessment - Final Report Addendum (ED032), assessed the modifications in line with the SEA regulations and ensures that that where negative effects are identified, measures are proposed to avoid, minimise or mitigate (compensate for) such effects. Where positive effects are identified, measures are considered that could enhance such effects.
Gail De Souza	MMC-E-291	Concerned that cumulative impacts arising from multiple Main Modifications in ED030 do not appear to be fully assessed in the Integrated Impact Assessment (ED032).	This comment does not relate to a specific proposed Main Modification. The Local Plan was submitted alongside a detailed assessment of impact as set out in the Newham Local Plan (Regulation 22) – Integrated Impact Assessment (SD006) and its appendices (SD007). The matters of cumulative impacts,

Respondent	Question / Reference	Comment	LBN Response
			including equalities impacts, have been thoroughly assessed as part of Matter 1 examination hearings and the Inspector did not identified any issues with regards to the Local Plan meeting the relevant legal duties (see ED001, EWS001 and IN5.1). As set out in the Newham Local Plan (Regulation 22) – Integrated Impact Assessment - Final Report Addendum (ED032), screening findings, none of the Main Modifications significantly affect the findings of the previous IIA work presented in the IIA Report (SD006), which means that the original findings of the IIA with regards to likely impacts of the policies remain relevant and no detailed re-assessment is necessary. Community Wealth Building pledges have informed the objectives of the Local Plan. Newham's commitment to ensuring development is inclusive and promotes health and wellbeing is embedded across policies, for example policies BFN2, BFN3, D1, D2, SI2, T2) It is not considered that further impact assessment of the policies is required.
Gail De Souza	MMC-E-291	Requires further clarity that the Plan consistently considers issues of climate adaption, flood risk management, biodiversity net gain and air quality impacts. Consistency should be demonstrated between ED030 policies and the conclusions of ED032 and ED033.	This comment does not relate to a specific proposed Main Modification. The Local Plan was submitted alongside a detailed assessment of impact as set out in the Newham Local Plan (Regulation 22) – Integrated Impact Assessment (SD006) and its appendices (SD007). The matters of cumulative impacts, including climate adaption and mitigation, have been assessed as part of Matter 1 examination hearings and the Inspector did not identify any issues with regards to the Local Plan meeting the relevant legal duties (see ED001, EWS001 and IN5.1). As set out in the Newham Local Plan (Regulation 22) – Integrated Impact Assessment - Final Report Addendum (ED032), screening findings, none of the Main Modifications significantly affect the findings of the previous IIA work presented in the IIA Report (SD006), which means that the original findings of the IIA with regards to likely impacts of the policies remain relevant and no detailed re-assessment is necessary. The Habitat Regulations Assessment addendum (ED033) concludes that the five modifications found to amend elements of policy that would interact with the findings of the submission HRA all strengthened the provision of recreational space provision as an alternative to Epping Forest SAC, with one (MM72) adding commitment to the Epping Forest SAC Recreation Mitigation Strategy specifically

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			implemented as mitigation for the effects of recreational disturbance on this European site. Flood risk was considered as part of the examination process on a range of matters, including in relation to site allocation (Matter 4, EWS014), specific flood risk policies (Matter 11, EWS050), and water spaces (Matter 12, EWS053), and resulted in a number of modifications being proposed to ensure consistency and effectiveness of flood management across sections of the Plan. Air quality is appropriately managed through policy CE6 (EWS050), with main modification MM64 to Policy H11 providing additional guidance on how housing development can be designed to mitigate impacts (EWS030). The Plan follows national and London Plan standards with regards to biodiversity net gain, with policies supported by Natural England. This has not been changed through the examination process (EWS053). An appropriate monitoring framework is established though indicators 37, 38 and 39 (ED035, pg. 636). It is not considered that further policy changes or impact assessment of the policies is required.
Gail De Souza	MMC-E-291	Summary of concerns raised that the Proposed Main Modifications in ED030, supported by ED031, ED032 and ED033, must be justified by clear evidence, to demonstrate not only policy compliance, but also that it is realistically deliverable, equitable and capable of supporting sustainable long-term growth across Newham.	Comment noted. Please see detailed responses provided above.

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