

Sara Chiong

From: MANUEL, Mary (NHS NORTH EAST LONDON ICB - A3A8R)
Sent: 20 September 2024 14:35
To: Ellie Kuper Thomas; Local Plan
Subject: HUDU response to the Proposed Submission Local Plan
Attachments: HUDUresponseNewhamLocalPlanReg1920Sept2024.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Dear Ellie and Team,

Please find attached our response to the Council's Reg 19 Local Plan consultation.

Let me know if you have any queries regarding our representation.
Kind regards,

Mary

Mary Manuel (She/her)
Head of the NHS London Healthy Urban Development Unit
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NHS London Healthy Urban Development Unit

Planning Policy Team
London Borough of Newham
Newham Dockside
1000 Dockside Road
London E16 2QU

20th September 2024

Dear Planning Policy Team,

LB Newham Draft Submission Local Plan

Thank you for the opportunity to respond to the Newham Proposed Submission Draft Local Plan.

This response has been prepared in consultation with local NHS partners and builds on the representation submitted to the Council's regulation 18 consultation. The North East London Integrated Care Board (ICB) has led on the wider NHS contribution to the Council's Infrastructure Delivery Plan, and the quantum of primary and community infrastructure required to support the delivery of the plan, and we have therefore left comments on the wording of the site allocations and the IDP for the ICB to provide a detailed response.

We welcome the changes that the Council has made in response to our earlier representation, however, we are concerned that aspects of the plan have not been modified as requested and indeed some wording supported has been omitted from the latest draft.

We do consider that further changes are required to ensure the effective delivery of the local plan and the vision and objectives. The first paragraph of the vision includes "Our vision is for this transformation to build a fairer, healthier and happier borough". We consider that the amendments sought within this representation will contribute to the Plan being found sound.

BFN3 – Social Value and Health Impact Assessment

HUDU welcomes the amendment to the wording of criterion 1 of policy BFN3. We maintain that the policy should be updated to provide further details around the type and scale of development which should always be subject to a full HIA. Please see below HUDU comments submitted as part of the Reg 18 consultation:

We also note the draft requirement for screening of certain development proposals for HIAs. We support Newham's intention to encourage developers to consider at the pre-app stage what the health impacts of their proposals might be. However, we suggest that this policy is updated to reflect that some types of development proposals, such as major development over 100 dwellings, should always require the production of a full HIA. Smaller development, such as the development of certain sui generis uses could still be screened for the potential need for an HIA. We therefore recommend Newham update the policy to indicate what types of developments will always need a full HIA and what types of smaller scale development may require a HIA as a result of screening.

Furthermore, in our previous response we illustrated our support for the Council's intention to monitor HIAs but recommend the Council provide further details regarding how this will be undertaken. We note that the intention to monitor HIAs has been removed from the latest iteration of the Draft Local Plan and we would suggest that this is something that is included and/or still considered by the Council.

BFN4 - Developer contributions and Infrastructure Delivery

HUDU maintains its position that the prioritisation hierarchy outlined in clause 3 of policy BFN4 should be amended as below:

Clause 3. Where financial viability concerns are substantiated, it is expected that the Plan's objectives will be prioritised as follows:

- a. affordable and family housing*
- b. health and community infrastructure*
- c. local access to employment and training*
- d. delivery of other required infrastructure*

Clause 4. Developments at or over 250 units/hectare density or on site allocations or proposals comprising of 100 + homes; a scale referable to the Mayor of London will be required to demonstrate there is sufficient infrastructure to support the proposed scale of development.

This amendment would ensure that the policy is more reflective of the draft plan's vision and objectives as well as the Council's wider priorities. As previously outlined, Newham's health outcomes are consistently significantly lower than both the London and England averages, whilst economic activity level remain in line or above comparable averages.

We also recommend that reference is made to HUDU's developer contributions model in the policies supporting text in line with an increasing number of other London authorities.

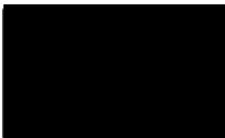
D2 - Public Realm Net Gain

HUDU welcomes the removal of a reference to a specific time span regarding management and maintenance plans. However, a clear reference to the need for indefinite management and maintenance plans should be included.

We look forward to working with the Council and partners in delivering the vision and objectives of the local plan.

Please do not hesitate to contact me should you have any queries regarding any aspect of this letter.

Your sincerely,



Mary Manuel
Head of the NHS London Healthy Urban Development Unit