NEWHAM LOCAL PLAN REVIEW
EXAMINATION

On behalf of CBRE Global Investors

Hearing Statement: Matter 6
Examination Questions: 6.1

June 2018
1.0 Matter 6

**MATTER 6: HOMES**

1.1 CBRE Limited (CBRE) is instructed by CBRE Global Investors to address the Examining Inspector’s questions from the perspective of our client’s property interests at Standard Industrial Estate, Silvertown E16 2ES.

1.2 We refer the Inspector to the representations made on behalf of our client responding to Proposed Submission consultation¹.

1.3 CBRE has prepared hearing statements in respect of four Matters (Matters 1, 3, 5 and 6). Given the structure of the Inspector’s questions under Matter 6 we have not repeated the substance of the case within this Statement but made reference to our other Statements.

1.4 This Statement responds to the Inspector’s Questions 6.1.

**Question 6.1 Overall Housing Need for Newham**

Policy H1 provides for a net increase of at least 43,000 new homes in Newham over the period 2018-2033, i.e. 2,867 dpa. This figure accords with the adopted London Plan, which makes provision for a minimum of 19,945 new homes over the period 2015-2025 (i.e. 1,994 pa, which rolled over to 2030, produces a figure of 43,868 homes). The emerging Draft London Plan, however, proposes a higher housing target for Newham of 3,850 dpa, based on more recent assessments of housing need. Given the dramatic increase in housing need for Newham which is set out in the emerging Draft London Plan and with reference to section 6 of the Framework:

(i) Does the submitted Plan accord with the Government’s prioritisation of the delivery of new homes, as expressed in its recent White Paper, or is the Plan unnecessarily cautious in terms of housing delivery?

1.5 We do not consider that the draft Local Plan in its current form to adequately plan to meet identified housing needs.

1.6 The target housing delivery numbers set out in the Proposed Submission (2,867/year as an annualised figure) are significantly lower than those set out within the Draft London Plan (3,850/year), and also much lower than those which would be applied using the Government’s proposed housing needs methodology (3,840/year).

1.7 The Royal Docks and Beckton Riverside OA is also expected to deliver 30,000 homes in the Draft London Plan, which represents 19,000 more than the adopted London Plan. There is therefore a clear need for both high density residential/mixed use development which is not fully planned for.

1.8 By not planning for the most up to date assessment of housing need, the Proposed Submission cannot be considered to be ‘positively prepared’ in the context of the NPPF. It is also not aligned with the Draft London Plan’s growth strategy for the Opportunity Area.

¹ CBRE representations to the London Borough of Newham’s Local Plan Review: Proposed Submission (January 2018)
Suggested Modification

The target housing delivery numbers set out in the Proposed Submission (2,867/year) should be revised in line with the Draft London Plan figures (3,850/year), and/or the Government’s proposed housing needs methodology (3,840/year).

(ii) Should the overall housing need figure for Newham remain as set out in the submitted Plan, in accordance with the provision of the adopted London Plan; and/or

(iii) Should the housing provision in the Plan be subject to an early review as soon as the emerging London Plan is adopted?

1.9 As noted in response to question 6.1(i) CBRE consider that the housing need figure should be revised in line with the Draft London Plan figures and/or the Government’s proposed housing needs methodology so as to boost significantly the supply of housing as set out in paragraph 47 of the NPPF. The suggestion to undertake an early review is considered to be impractical given that the emerging London Plan is expected to be adopted in Autumn 2019. It is our considered view that it would be more effective for the draft Local Plan to be based on the most recent assessments of housing need now rather than an alternative route whereby it is subject to an early review almost immediately after it is expected to be adopted.