

LONDON BOROUGH OF NEWHAM

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC WRITTEN STATEMENT

MAIN MATTER 4: NEIGHBOURHOOD POLICIES AND ALLOCATIONS

WE ARE NEWHAM.

Site allocations and flood risk

Q4.1 Are all of the allocations in the Plan justified and consistent with national policy relating to flood risk, and will development on each be safe for its lifetime?

Council Response:

- 1.1 The National Planning Policy Framework (NPPF) and associated Planning Practice Guidance for Flood Risk and Coastal Change (PPG) set out the active role Local Planning Authorities should take to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process. The NPPF outlines that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and Local Planning Authorities should use the findings to inform strategic land use planning.
- 1.2 The NPPF sets out in paragraph 160 that strategic policies should be informed by a Strategic Flood Risk Assessment and take account of advice of the Environment Agency and/ or other flood risk management authorities. Paragraph 161 goes on to require that development is directed away from areas of flood risk through the application of the sequential test, and if required, the exceptions test. In the Statement of Common Ground (SD054), the Environment Agency agreed amendments to the SFRA Level 1 and Level 2 and to the Sequential test, exception test and site allocation tables for all site allocations to provide the clarity required to inform the development management process in the future therefore Environment Agency endorses the final assessments.
- 1.3 All site allocations are justified by Newham's Site Allocations Sequential Test (EB090), which sets out the application of the Sequential and Exception Tests for more vulnerable uses. These tests are based on data from the Level 1 and 2 Strategic Flood Risk Assessments (SFRA) (2025) (EB078-89), compiled by JBA Consulting and endorsed by the Environment Agency, providing proportionate and up-to-date evidence. The SFRA Level 1 (2025) provided a borough wide overview of flood risk to inform spatial planning and development policies, The SFRA Level 2 (2025) builds on Level 1 by providing site-specific assessments for areas where development is proposed in flood risk zones. The SFRA Level 1 and 2 (2025) follows the procedural arrangements on flood risk set out in the National Planning Policy Framework (NPPF 2023) and Planning Practice Guidance (PPG).
- 1.4 The Plan considered reasonable alternatives through its site selection process (see EB090, section 5). Flood risk was assessed as part of this process. No sites were excluded solely due to flood risk, but where risk was identified, it is addressed through development and design principles.
- 1.5 In line with NPPF 2023 (paragraphs 159–169), flood risk has been assessed, and inappropriate development in areas at highest risk has been avoided where possible. Where development in medium or high-risk areas is necessary, it will be made safe for its lifetime without increasing flood risk elsewhere. All allocations have satisfied the Sequential and Exception Tests (see Appendix 1). Developments in areas of medium or high flood risk have passed the Exception Test. Part b) of the test requires site-specific Flood Risk Assessments to demonstrate that development will be safe for its lifetime, without increasing flood risk elsewhere, and, where possible, reducing overall risk. Evidence of compliance is provided in EB090 Appendix 1.
- 1.6 Chapter 5 of the SFRA Level 2 and EB090 outlined how developments will be made safe for their lifetime, by requiring:
 - Site-specific Flood Risk Assessments (FRAs) that evaluate all sources of flooding and include climate change impacts.

- Local requirements for mitigation measures as set out in SFRA Level 1 (2025)
- Consideration of residual risk from reservoirs
- Emergency planning, including safe access/egress routes and refuge areas.
- Consideration of flood duration and onset, to ensure evacuation or shelter is feasible.

N17 Gallions Reach:

Q4.2 Are policies N17 and N17.SA1 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Gallions Reach neighbourhood? In particular:

- a) The dependence on an extension to the DLR and the creation of a new DLR station, or a similarly transformative public transport intervention (such as a new river crossing).
- b) The requirements relating to the scale, location, type and timing of development in relation to the provision of improved public transport infrastructure.
- c) The requirements relating to the creation of a new town centre and development at the existing Gallions Reach shopping park in N17 part 5, N17.SA1 and HS1 part 2.
- d) The requirements relating to tall buildings, having regard to constraints associated with London City Airport.
- e) The requirement for development to deliver an automated vacuum waste collection system.
- f) The requirements relating to the mitigation of odour impacts from the Beckton Sewage Treatment Works.
- g) The assumption that around 3,000 homes will be built on site allocation N17.SA1 between 2028 and 2038.

Council Response:

2. Note, this paragraph is relevant to all Neighbourhood related questions. Overall the delivery of the neighbourhood policies and site allocations identified in Part 2 of the plan are central to achieving the London Plan 'good growth' objectives which set out six key objectives (GG1 – GG6) focused on building strong and inclusive communities, making the best use of land, delivering the homes that London needs and growing the economy whilst maintaining resilience and efficiency. Part 2 seeks to allocate sufficient sites to deliver the strategic priorities of the neighbourhood in accordance with NPPF (2023), they provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. Rather than repeating this across each of the neighbourhood questions, this is set out once for the sake of brevity.
- 2.1 a) The extension of the DLR to Beckton Riverside and Thamesmead with a station at Beckton Riverside is a priority project identified in Newham's Sustainable Transport Strategy (2024) (EB093, page 75). This accords with the recent public consultation document for the new London Plan, 'Towards a New London Plan' (2025) which highlights the dependence that the wider current brownfield housing figure for Opportunity Areas has on the delivery of the DLR extension to Thamesmead. This scenario is tested as feasible and viable through the capacity study (ED003b) and viability assessment (EB099).

- 2.2 b) Policies N17 and N17.SA1 is considered suitably flexible to enable development to occur under a range of scenarios. It is considered there will be sufficient time for phases of development to occur during the works to build out the DLR and enable the development of a sense of place.
- 2.3 In agreement with TfL, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route.
- 2.4 It is considered that the letting of the DLR construction contract remains the most appropriate trigger for the more transformational stage of development as reflected in the proposed modifications (SD004) to align the implementation text with the updated transport strategy for the site (MO41). Until the DLR contract is let and transformational development can occur in the northern part of the site allocation, including Gallions Reach Shopping Park, the shopping park remains an out of centre retail park and will be treated as such in policy.
- 2.5 c) The policy requirements for the creation of a new town centre and development at the existing Gallions Reach shopping park represent a continuation of an existing strategic aspiration, as set out in the existing Local Plan (2018) and through the London Plan Annex 1, Table A1.1 Town Centre Network, which identify Gallions Reach shopping park as a potential to develop into a future town centre of a major scale. This potential has been further explored through the Retail and Leisure Study 2022 (EB029) across its analysis of existing performance, retail need and leisure demand, and conclusions and recommendations (paragraphs 14.40 and 14.45, recommendation LBN11).
- 2.6 Policy HS1 Part 2 provides detailed criteria to ensure good placemaking principles for high streets are embedded into the masterplanning process of applicants, and that the delivery of the town centre is aligned with the other enabling infrastructure requirements for the site, particularly the DLR extension, and consistent with the council's approach to out of centre retail and cafes and restaurants development set out in policy HS3. The Council recognises the importance of ensuring the Plan is effective and easy to read and has therefore proposed a modification (SD004) to HS2 Part 2 to clarify the approach to managing the out of centre retail park through the masterplanning process (MO37) and to align implementation text with the updated transport strategy for the site (MO41).
- 2.7 d) The tall building requirements for N17.SA1 are a result from an assessment that is in conformity with the London Plan policies D1, D3 and D9. Further details on this can be found in Chapter 7 "Supporting optimisation of sites" of the Tall Building Topic Paper (2025) (TP001). Newham Characterisations Study (EB018) and Tall Building Annex (EB023) set out the tall building assessment. The assessment of N17 Gallions Reach is set out in Chapter 8 Vision Neighbourhood Principles part 3 of Newham Characterisation Study, p.265 (2024) (EB018)
- 2.8 The Tall Building Annex (EB023) identifies suitable locations for tall buildings within airport exclusion zones, these have been designated at the lower permissible heights. The site allocation will work alongside Local Plan policy D4 (Tall buildings), which provides further guidance on how tall buildings are expected to be delivered, including referencing airport height constraints, and alongside policy T5.6 (Airport), which addresses engagement requirements with the London City Airport.
- 2.9 The Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made a wording change which is highlighted in response to Matter 3 (MO22.15).
- 2.10 e) The Topic Paper 'Waste management in developments: automated vacuum waste collection systems (2024)' (TP006) sets out the justification for the delivery of automated

vacuum waste collection systems for the borough's largest residential housing schemes. The policy requirement is also consistent with the London Plan (2021), which is clear in its aspiration to reduce the dominance of vehicles on London's streets whether stationary or moving (Policy T2.D.2 – p.403) and ensure that development proposals facilitate safe, clean, and efficient deliveries and servicing (Policy T7.G – p.436).

- 2.11 The Council's Waste and Recycling team have raised concerns around the logistical challenges of servicing so many units using traditional collection methods for the first phase of development on this allocation (ref. 24/00989/OUT). The developer has agreed to commit to a Section 106 obligation that requires the submission of a feasibility study looking at the potential for the site to deliver an underground pneumatic waste collection system in later phases of the development.
- 2.12 The viability of the broader policy requirement has been tested in the Local Plan Regulation 19 viability report (EB099). The assessment concluded that the upfront cost of installing ENVAC systems is modest and will have a limited impact on viability (paragraph 6.57, p.58). On this basis, we consider the policy requirement to be effective.
- 2.13 f) The Beckton Riverside site allocation is located within 800m of BSTW, inside Thames Water's consideration zone, as defined in their guideline "Risk assessment for odour encroachment". The policy requirement in N17.1(14) and N17.SA1 design principles is a continuation of the existing requirement in the adopted Local Plan (2018). It also addresses the agent of change principle in the vicinity of the existing Beckton Sewage Treatment Works (BSTW), which is consistent with London Plan Policy D13.
- 2.14 The council acknowledges the importance that the Local Plan is effective and proposed the modification (SD004) to include the requirement that any necessary mitigations have to be completed ahead of occupation of development in both the neighbourhood policy (MO94.7) and site allocation (MO94.8).
- 2.15 g) Yes, this figure and the phasing period (medium to long term) broadly aligns with the Regulation 19 Housing Trajectory (3,011 homes).
- 2.16 Site allocation N17.SA1 figure has been informed by the capacity testing undertaken through Newham's Characterisation Study.

N1 North Woolwich

Q4.3 Are policies N1, N1.SA1 and N1.SA2 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the North Woolwich neighbourhood? In particular:

- a) The proposals for improvements to public transport, walking and cycling infrastructure.
- b) The requirements relating to tall buildings, having regard to constraints associated with London City Airport.
- c) The assumption that around 350 homes will be built on N1.SA1 between 2027 and 2029.
- d) The assumption that around 140 homes will be built on N1.SA2 between 2028 and 2033.

Council Response:

- 3.1 a) North Woolwich neighbourhood has high levels of severance and poor connections to adjacent neighbourhoods as set out in Chapter 8 Vision Neighbourhood Principles part 3 of Newham Characterisation Study, p.175 (2024) (EB016).

- 3.2 The walking and cycling improvements in the Royal Docks Corridor between Canning Town and Woolwich Crossing is a priority project identified in Newham's Sustainable Transport Strategy (2024) (EB093) p.99.
- 3.3 b) The tall building requirements for N1.SA1 North Woolwich Gateway and N1.SA2 Rymill Street site allocations are a result from an assessment that is in conformity with the London Plan policies D1, D3 and D9. Further details on this can be found in Chapter 7 "Supporting optimisation of sites" of the Tall Building Topic Paper (2025) (TP001). Newham Characterisations Study (EB018) and Tall Building Annex (EB023) set out the tall building assessment. The assessment of N1 North Woolwich is justified and is set out in Chapter 8 Vision Neighbourhood Principles part 1 of Newham Characterisation Study, p.173 (2024) (EB016).
- 3.4 The Tall Building Annex (EB023) identifies suitable locations for tall buildings within airport exclusion zones, and these have been designated at the lower permissible heights.
- 3.5 The site allocations will work alongside Local Plan policy D4 (Tall buildings), which provide further guidance on how tall buildings are expected to be delivered, including referencing airport height constraints, and alongside policy T5.6 (Airport), which addresses engagement requirements with the London City Airport.
- 3.6 The Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made a wording change which is highlighted in response to Matter 3 (MO22.10).
- 3.7 c) Yes, this figure and the phasing period (short to medium term) aligns with the Regulation 19 Housing Trajectory (350 homes). This is the version of the Housing Trajectory that informed the Regulation 19 Draft Submission Local Plan submitted to the Planning Inspectorate. Site allocation N1.SA1 is justified and positively prepared, with the housing figure having been informed by the resolution to grant planning permission under reference 22/02662/FUL (350 units).
- 3.8 d) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (143 homes).
- 3.9 Site allocation N1.SA2 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.

N2 Royal Victoria

Q4.4 Are policies N2, N2.SA1, N2.SA2, N2.SA3, N2.SA4 and N2.SA5 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Royal Victoria neighbourhood? In particular:

- a) The requirements relating to exiting and improved transport infrastructure on site N2.SA1.
- b) The requirements relating to the location and design of employment uses on sites N2.SA2, N2.SA3 and N2.SA4 and the relationship with the adjoining existing industrial uses including SIL.
- c) The requirements relating to tall buildings.
- d) The assumption that around 2,900 homes will be built on N2.SA1 between 2028 and 2038.
- e) The assumption that around 800 homes will be built on N2.SA2 between 2028 and 2033.
- f) The assumption that around 1,380 homes will be built on N2.SA3 between 2028 and 2034.
- g) The assumption that around 2,400 homes will be built on N2.SA4 between 2026 and 2038.
- h) The assumption that around 140 homes will be built on N2.SA5 between 2028 and 2033.

Council Response:

- 4.1 a) Policy N2.SA1 is informed by the Sustainable Transport Strategy (2024) (EB093) p.76, which sets out that capacity improvements will be required at DLR stations as a result of development, including Pontoon Dock to the south of the site.
- 4.2 The Silvertown Quays Bridge is a priority project identified in Newham's Sustainable Transport Strategy (2024) (EB093) p.99 and is necessary to connect Silvertown Quays to Custom House.
- 4.3 In terms of effectiveness, potential funding for the bridge delivery is identified as coming from TfL, LB Capital Programme / developer contributions in Newham's Sustainable Transport Strategy (2024) (EB093, p.99). In the event that the delivery of the bridge places a significant constraint on viability, Policy BFN4.3 in the Local Plan provides a clear prioritisation of obligations where substantiated financial viability constraints are demonstrated. This hierarchy would guide the assessment of schemes, allowing officers to afford considerable weight to the bridge delivery within the overall planning balance.
- 4.4 b) The requirements related to the location of employment uses on these sites are based on the following principles:
- within the boundary of industrial designations (SILs, LILs, Local Mixed-Use Areas (LMUAs)) which are based on review through the Employment Land Review 2022 (EB048 – EB054) and Proposed New Employment Land Designations and Boundary Amendments (EB055) (N2.SA3 and N2.SA4);
 - or adjacent to the existing Tate and Lyle Sugar factory sites at Thameside West SIL (N2.SA2) and Thameside East SIL (N2.SA3) as buffer to residential uses as recommended in the design-led capacity testing (ED003b).
- 4.5 At N2.SA2 and N2.SA3, non-residential stacked industrial building is considered as the most appropriate typology as concluded in the Characterisation Study (EB019). The buffer will be achieved through masterplanning with other design mitigations as set out in the design principles. In addition, the buffer building will provide employment capacity to meet the imminent industrial demand in the borough as evidenced in the Employment Land Review 2022. These are in line with the London Plan's requirements in meeting industrial needs and managing relationship between residential and industrial uses in Policies E4, E5 and E7.
- 4.6 These locational and design requirements are tested feasible and viable through the capacity study (ED003a) and viability assessment (EB099).
- 4.7 c) The tall building requirements for the five site allocations within Royal Victoria are a result from an assessment that is in conformity with the London Plan policies D1, D3 and D9. Further details on this can be found in Chapter 7 "Supporting optimisation of sites" of the Tall Building Topic Paper (2025) (TP001). The assessment of N2 Royal Victoria is justified and is set out in Chapter 8 Vision Neighbourhood Principles part 1 of Newham Characterisation Study, p.179 (2024) (EB016).
- 4.8 More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) (EB023) and Tall Buildings Topic Paper (2025) (TP001).
- 4.9 Each allocation's design principles provide a range of prevailing heights and maximum height parameters to enable the most appropriate form of development whilst sensitively integrating with the scale and massing of the existing and emerging urban fabric.
- 4.10 Further details on the justification for maximum height and prevailing height parameters can be found in chapter 2 'Flexibility within tall buildings' of the Tall Buildings Topic Paper (2025).
- 4.11 The site allocations will work alongside Local Plan policy D4 (Tall buildings) which provide further guidance on how tall buildings are expected to be delivered, including referencing airport height constraints.

- 4.12 d) No, this figure does not align with the Regulation 19 Housing Trajectory, which over this phasing period (2028 to 2038, medium to long term) shows this site delivering 1,988 homes.
- 4.13 The submission Local Plan indicates site allocation N2.SA1 as being delivered over the short to long term phasing period. Over this phasing period (2023 – 2038), the housing trajectory does show that this site will deliver 2,931 homes, which broadly aligns with the site capacity figure referred to in this question.
- 4.14 Site allocation N2.SA1 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham’s Characterisation Study.
- 4.15 e) No, this figure does not align with the Regulation 19 Housing Trajectory, which over this phasing period (2028 to 2033, medium term) shows this site delivering 558 homes.
- 4.16 The submission Local Plan indicates site allocation N2.SA2 as being delivered over the short to medium term phasing period. Over this phasing period (2025 – 2033), the housing trajectory does show that this site will deliver 810 homes, which broadly aligns with the site capacity figure referred to in this question.
- 4.17 Site allocation N2.SA2 is justified and positively prepared, with the housing figure having been informed by planning permission 19/01791/FUL (252 homes approved, not started) and the capacity testing undertaken through Newham’s Characterisation Study (558 homes).
- 4.18 f) No, this figure does not align with the Regulation 19 Housing Trajectory, which over this phasing period (2028 to 2034, medium to long term) shows this site delivering 1,083 homes.
- 4.19 The submission Local Plan indicates site allocation N2.SA3 as being delivered over the short to long term phasing period. Over this phasing period (2024 – 2034), the housing trajectory does show that this site will deliver 1,384 homes, which broadly aligns with the site capacity figure referred to in this question.
- 4.20 Site allocation N2.SA3 is justified and positively prepared, with the housing figure having been informed by the following planning permissions across three individual sites which make up the wider site allocation: site 1: 22/00418/FUL (140 homes approved, not started), site 2: 20/01046/FUL (161 homes approved, under construction) and site 3: informed by the capacity testing undertaken through Newham’s Characterisation Study (1,083 homes).
- 4.21 g) Yes, this figure and the phasing period (short to long term) aligns with the Regulation 19 Housing Trajectory (2,400 homes).
- 4.22 Site allocation N2.SA4 housing figure has been informed by the following planning permission: 18/03557/OUT (5000 homes approved, not started, with phasing extending beyond the plan period).
- 4.23 h) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (136 homes).
- 4.24 Site allocation N2.SA5 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham’s Characterisation Study.

N3 Royal Albert North

Q4.5 Are policies N3 and N3.SA1 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Royal Albert North neighbourhood? In particular:

- a) The proposed realignment of Royal Albert Way and northern Connaught roundabout.
- b) The requirements relating to tall buildings, having regard to constraints associated with London City Airport.
- c) The assumption that around 1,920 homes will be built on N3.SA1 between 2025 and 2038.

Council Response:

- 5.1 a) The realignment of the existing highways infrastructure has the potential to free up additional land for development, which is currently heavily constrained by raised highways infrastructure. The realignment of the highway accords with London Plan (2021) Policy D3.A, which requires development to respond to a site's context and capacity for growth (p.110).
- 5.2 The council's highways team are supportive of the rationalisation of the existing highways infrastructure; however, they have stated that costs to deliver the works are likely to be significant. Noting the need to ensure effectiveness of the plan and recognising the costs associated with delivering these highway improvements, the allocation does not require the delivery of this infrastructure requirement but instead refers to it as an option in the event the developer brings this aspiration forward. Should the proposed infrastructure not come forward, then additional homes would not be provided in the western part of the allocation. The lower range housing trajectory figure accounts for this scenario.
- 5.3 b) The tall building requirements for N3.SA1 Royal Albert North site allocation within the Royal Albert North neighbourhood are a result from an assessment that is in conformity with the London Plan policies D1, D3 and D9. Further details on this can be found in Chapter 7 "Supporting optimisation of sites" of the Tall Building Topic Paper (2025) (TP001). The assessment of N3 Royal Albert North is set out in Chapter 8 Vision Neighbourhood Principles part 1 of Newham Characterisation Study, p.185 (2024) (EB016).
- 5.4 The Tall Building Annex (EB023) identifies suitable locations for tall buildings within airport exclusion zones, these have been designated at the lower permissible heights.
- 5.5 The site allocation will work alongside Local Plan policy D4 (Tall buildings), which provide further guidance on how tall buildings are expected to be delivered, including referencing airport height constraints, and alongside policy T5.6 (Airport), which addresses engagement requirements with the London City Airport.
- 5.6 The Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made a wording change which is highlighted in response to Matter 3 (MO22.12).
- 5.7 c) Yes, this figure broadly aligns with the Regulation 19 Housing Trajectory (1,919 homes). However, the phasing period for this site is not short to long term (2025 to 2038) but medium to long term (2028 to 2038).
- 5.8 Site allocation N3.SA1 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.

N4 Canning Town

Q4.6 Are policies N4, N4.SA1, N4.SA2, N4.SA3, N4.SA4 and N4.SA5 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in Canning Town neighbourhood? In particular:

- a) The requirements for the provision of employment uses, including B class, on site N4.SA3.
- b) The safeguarding of land for a bridge landing point on site N4.SA5.
- c) The requirements relating to waste management uses on site N4.SA5.
- d) The assumption that around 1,390 homes will be built on N4.SA1 between 2028 and 2038.
- e) The assumption that around 170 homes will be built on N4.SA2 between 2028 and 2033.
- f) The assumption that around 220 homes will be built on N4.SA3 between 2028 and 2033.
- g) The assumption that around 700 homes will be built on N4.SA4 between 2028 and 2038.
- h) The assumption that around 870 homes will be built on N4.SA5 between 2027 and 2033.

Council Response:

- 6.1 a) The requirement for employment uses on this site allocation is consistent with London Plan Policy E7.C and is justified as supported by evidence.
- 6.2 The Employment Land Review 2022 (EB048) identifies a strong need in industrial floorspace in Newham, and the Local Plan seeks to protect all existing capacity. The site contains a range of industrial uses at the northeast. The requirement for employment floorspace within E(g) and B use classes would reprovide existing capacity at the site. Lighter industrial uses within B use class such as storage or distribution is considered suitable for co-location with residential development through careful masterplanning as evidenced in Chapter 9 of the Newham Characterisation Study 2024 (EB019).
- 6.3 The GLA's Regulation 19 representation supports retaining existing industrial capacity on the site as part of a plan-led approach to meeting the borough's industrial needs over the Plan period.
- 6.4 The requirement is tested feasible and viable through the capacity study (ED003a) and viability assessment (EB099).
- 6.5 b) The safeguarding of land for a walking and cycling bridge linking Canning Town to the Limmo Peninsula is a priority project identified in Newham's Sustainable Transport Strategy (2024) (EB093). This accords with London Plan (2021) Policy T3.B (p.406), which sets out that development should ensure the provision of sufficient and suitably-located land for the development of the expanded public and active transport system to serve London's needs.
- 6.6 In terms of effectiveness, potential funding for the bridge delivery is identified as coming from TfL, LB Capital Programme / developer contributions in Newham's Sustainable Transport Strategy (2024) (EB093, p.100). In the event that the delivery of the bridge places a significant constraint on viability, Policy BFN4.3 in the Local Plan provides a clear prioritisation of obligations where substantiated financial viability constraints are demonstrated. This hierarchy would guide the assessment of schemes, allowing officers to afford considerable weight to the bridge delivery within the overall planning balance.
- 6.7 c) The waste capacity on the site has been fully re-provided at a new site at Standard Industrial Estate (located in Newham), in accordance with the emerging policy requirement. This was assessed under approved application 24/00088/FUL.
- 6.8 Noting that the site now benefits from extant consents that support the re-provision of the lawful waste use (as per policy SI 9 of the London Plan – p.378), permissions on the allocation are considered to accord with the site allocation requirements and are therefore considered to be justified and effective requirements.

- 6.9 d) No, this figure does not align with the Regulation 19 Housing Trajectory, which over this phasing period (2028 – 2038, medium to long term) shows this site delivering 1,241 homes.
- 6.10 The submission Local Plan indicates site allocation N4.SA1 as being delivered over the short to long term phasing period. Over this phasing period (2025 – 2038), the housing trajectory does show that this site will deliver 1,388 homes, which broadly aligns with the site capacity figure referred to in this question.
- 6.11 Site allocation N4.SA1 is justified and positively prepared, with the housing figure having been informed by the following planning permission: 22/02615/LA3 S15 (147 homes approved, not started) and the capacity testing undertaken through Newham's Characterisation Study (1,241 homes).
- 6.12 e) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (168 homes).
- 6.13 Site allocation N4.SA2 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.
- 6.14 f) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (216 homes).
- 6.15 Site allocation N4.SA3 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.
- 6.16 g) Yes, this figure and the phasing period (medium to long term) broadly aligns with the Regulation 19 Housing Trajectory (697 homes).
- 6.17 Site allocation N4.SA4 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.
- 6.18 h) Yes, this figure and the phasing period (short to medium term) broadly aligns with the Regulation 19 Housing Trajectory (871 homes).
- 6.19 Site allocation N4.SA5 is justified and positively prepared, with the housing figure having been informed by the resolution to grant planning permission under reference 23/00038/FUL (871 units).

N5 Custom House

Q4.7 Are policies N5, N5.SA1, N5.SA2, N5.SA3 and N5.SA4 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Custom House neighbourhood? In particular:

- a) The assumption that around 590 homes will be built on N5.SA1 between 2025 and 2029.
- b) The assumption that around 380 homes will be built on N5.SA2 between 2033 and 2038.
- c) The assumption that around 80 homes will be built on N5.SA3 between 2033 and 2038.
- d) The assumption that around 120 homes will be built on N5.SA4 between 2025 and 2026.

Council Response:

- 7.1 a) No, this figure does not align with the Regulation 19 Housing Trajectory, which over this phasing period (2025 – 2029, short – medium term) shows this site delivering 297 homes.
- 7.2 Over the longer phasing period 2025 – 2031 (short – medium term), the housing trajectory shows that this site will deliver 593 homes, which broadly aligns with the site capacity figure referred to in this question.

- 7.3 Site allocation N5.SA1 is justified and positively prepared, with the housing figure having been informed by the following planning permissions across three individual sites which make up the wider site allocation: site 1: 22/02157/LA3 (55 homes approved, not started), site 2: 22/01853/FUL (95 homes approved, under construction) and site 3 23/00610/OUT (443 homes, resolution to grant).
- 7.4 b) Yes, this figure and the phasing period (long term) broadly aligns with the Regulation 19 Housing Trajectory (381 homes).
- 7.5 Site allocation N5.SA2 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.
- 7.6 c) Yes, this figure and the phasing period (long term) broadly aligns with the Regulation 19 Housing Trajectory (77 homes).
- 7.7 Site allocation N5.SA3 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.
- 7.8 d) Yes, this figure and the phasing period (short term) broadly aligns with the Regulation 19 Housing Trajectory (116 homes).
- 7.9 Site allocation N5.SA4 is justified and positively prepared, with the housing figure having been informed by the following planning permission: 23/00023/OUT (116 homes approved, not started).

N6 Manor Road

Q4.8 Is policy N6 justified, consistent with the London Plan, and will it be effective in helping to encourage significant levels of growth and achieve sustainable development in the Manor Road neighbourhood?

Council Response:

- 8.1 Yes, policy N6 sets out a vision for a successful employment focused neighbourhood with the optimisation and intensification of industrial land as set out in Chapter 8 Vision Neighbourhood Principles part 2 of Newham Characterisation Study, p.203 (2024) (EB017) and Employment Land Review (2022) (EB050). The majority of the neighbourhood is designated as a Strategic Industrial Location (SIL2 British Gas/ Cody Road) where it provides the most modern employment space in the Lower Lea Valley isolated from residential uses. Intensification of the industrial uses will help meet the strong industrial need in the borough as informed in the Employment Land Review.
- 8.2 This policy sets out justified and effective strategy in encouraging significant levels of growth and sustainable development in accordance paragraph 85, 86 and 87 of the NPPF (2023) and London Plan (2021) policy E7.

N7 Three Mills

Q4.9 Are policies N7, N7.SA1, N7.SA2, and N7.SA3 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Three Mills neighbourhood? In particular:

- a) The requirements relating to existing and new community facilities on site N7.SA1 and whether they will be effective in meeting the particular needs of the local community.

- b) The requirements relating to open space and greenspace on site N7.SA1.
- c) The requirements relating to the establishment of a network of streets on, and routes to and from, site N7.SA1.
- d) The requirements relating to access and capacity improvements at West Ham and/or Abbey Road stations on site N7.SA1.
- e) The layout of development illustrated on the site maps.
- f) Whether the detailed policy requirements are consistent with extant planning permissions.
- g) The assumption that around 600 homes will be built on N7.SA1 between 2028 and 2033.
- h) The assumption that around 4,880 homes will be built on N7.SA2 between 2024 and 2038.
- i) The assumption that around 850 homes will be built on N7.SA3 between 2023 and 2033.

Council Response:

- 9.1 a) The requirements relating to the existing and new community facilities on site N7.SA1 has been informed by the Community Needs Assessment (2022) (EB044) p.100 and in accordance with London Plan Policy S1. The development principles of the site allocation refer to the policy requirements in Local Plan Policies SI1 and SI2 to ensure the re-provision of community facilities meet the needs of the community. This includes undertaking a needs-based assessment for the facility.
- 9.2 Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2.
- 9.3 In terms of effectiveness, this requirement for the re-provision of the community facility is tested feasible and viable through the capacity study (ED003a) and viability assessment (EB099).
- 9.4 b) Newham's Green and Water Infrastructure Study (EB066) p.120 has identified a need for the site allocation, N7.SA1, to address green space deficiency by provision of a consolidated local park with a minimum of 2 ha, as well as additional green infrastructure such as enhancing the existing trees as a buffer to rail infrastructure. This is reflected in the infrastructure requirements for this site.
- 9.5 In terms of effectiveness, this requirement for green space is tested feasible and viable through the design-led capacity study (ED003a) and viability assessment (EB099).
- 9.6 c) The design requirements for N7.SA1 site allocation are drawn from the neighbourhood vision set out in the Chapter 8 Vision Neighbourhood Principles part 2 of Newham Characterisation Study (2024) (EB017), and from the design principles finalised in the design-led capacity testing (ED003a).
- 9.7 The requirement relating to the establishment of a network of streets on, and routes to and from the site reflect the Local Plan's desire to connect the site with the wider context, in particular with the Greenway and West Ham Station and to improve permeability through the site.
- 9.8 d) Three Mills neighbourhood has high levels of severance. Although the N7.SA1 site is located directly north-west of West Ham station, the existing site access is over 500 metres walk from the station entrance (using the Greenway). However, this section of Greenway will be closed until 2028 for maintenance works, with the station entrance being 1.1km walk from the existing site access. Internal discussion with Highways identified the need for a bridge connection to connect the site to West Ham station to address this access issue.
- 9.9 The Sustainable Transport Strategy (2024) (EB093, page 73-76) sets out that Abbey Road DLR station (located north east of N7.SA1) and the N7.SA1 site allocation is not served by a bus route, and that the DLR stations may need to be upgraded relative to the level of planned

development, therefore, the N7.SA1 site allocation includes contributions towards access and capacity at Abbey Road DLR station.

- 9.10 The Sustainable Transport Strategy (EB093, page 75-76) sets out that the improvements will need to be made to West Ham station given capacity issues that have been raised in TfL (Reg 19-E-013) and Network Rails' (Reg19-E-102) representations to the Local Plan. The access and capacity improvements at West Ham are justified as they have been identified in the wider sustainable transport projects in the Sustainable Transport Strategy (2024) (EB093, page 105).
- 9.11 The Strategy sets out the proposed priority Strategic Cycling Corridors. This includes a north-south route from Stratford to Canning Town. Highways colleagues have indicated that Manor Road (which connects Canning Town to West Ham and Stratford) does not have road space for segregated cycle routes, and therefore a route through the N7.SA1 Abbey Mills site is justified and is a key priority in delivering the wider cycle network.
- 9.12 e) The design requirements for the site allocations in the Three Mills neighbourhood are drawn from the neighbourhood vision set out in the Chapter 8 Vision Neighbourhood Principles part 2 of Newham Characterisation Study (2024) p. 209 (EB017), and from the design principles finalised in the design-led capacity testing (ED003a, ED003b).
- 9.13 The site allocation maps provide an illustrative representation of how the policy requirements could be delivered to reflect the neighbourhood's vision, including principles for movement routes through the site and indicative locations for infrastructure requirements and design principles. The council acknowledges that the optimal layout of development will be discussed and agreed at detailed design stage through masterplanning and planning application process.
- 9.14 f) The detailed policy requirements for the site allocations are considered to be largely consistent with extant planning permissions.
- 9.15 Planning consent (17/01847/OUT) has been granted for the Twelvetreets Park portion of N7.SA2 under the adopted Local Plan. The land uses permitted, and the detailed policy requirements are consistent, including delivery of a secondary school, health centre and a new Local Centre. However, it is noted that some requirements permitted at Twelvetreets Park do deviate slightly from the requirements in the submission Local Plan with tall elements at greater heights than the heights allowed within the TBZ designation in the submission plan. The submission Local Plan is justified as it has been informed by up-to-date evidence including a more detailed townscape analysis in the Newham Characterisation Study (2024) which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.
- 9.16 The outline parameters plan for Sugar House Island includes plot MU3 (N7.SA3) and this aligns with the proposed TBZ heights in the submission Local Plan. It is noted that the Local Centre shown on the proposed site allocation map is consistent with the Policies Map and based on an assessment of the outline parameters plans as set out in the Town Centre Network Review Methodology Paper Update 2024 (EB034).
- 9.17 g) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (596 homes).
- 9.18 Site allocation N7.SA1 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.
- 9.19 h) Yes, this figure and the phasing period (short - long term) broadly aligns with the Regulation 19 Housing Trajectory (4,882 homes).
- 9.20 Site allocation N7.SA2 is justified and positively prepared, with the housing figure having been informed by the following planning permissions: 17/01847/OUT, 19/02019/NONMAT &

21/01968/NONMAT (3,883 homes approved, under construction) and the capacity testing undertaken through Newham's Characterisation Study (1,049 homes).

- 9.21 i) Yes, this figure and the phasing period (short - medium term) broadly aligns with the Regulation 19 Housing Trajectory (853 homes).
- 9.22 Site allocation N7.SA3 is justified and positively prepared, with the housing figure having been informed by the following planning permissions: 12/00336/LTGOUT and associated reserved matters applications (760 homes approved, under construction) and the capacity testing undertaken through Newham's Characterisation Study (93 homes).

N8 Stratford and Maryland

Q4.10 Are policies N8, and N8.SA1 to N8.SA10 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Stratford and Maryland neighbourhood? In particular:

- a) The support in policy N7 part 1 for a moderate uplift in density in "enhance" areas.
- b) The requirements relating to tall buildings, including in terms of viability and the effect on
- c) The layout of development illustrated on the site maps.
- d) Whether the detailed policy requirements are consistent with extant planning permissions.
- e) The assumption that around 1,200 homes will be built on N8.SA1 between 2025 and 2038.
- f) The assumption that around 1,310 homes will be built on N8.SA2 between 2025 and 2038.
- g) The assumption that around 1,310 homes will be built on N8.SA3 between 2028 and 2038.
- h) The assumption that around 150 homes will be built on N8.SA4 between 2028 and 2033.
- i) The assumption that around 2,780 homes will be built on N8.SA5 between 2023 and 2038.
- j) The assumption that around 500 homes will be built on N8.SA6 between 2031 and 2032.
- k) The assumption that around 390 homes will be built on N8.SA7 between 2028 and 2033.
- l) The assumption that around 680 homes will be built on N8.SA8 between 2028 and 2033.
- m) The assumption that around 2,110 homes will be built on N8.SA9 between 2023 and 2033.
- n) The assumption that around 210 homes will be built on N8.SA10 between 2028 and 2033.

Council Response:

- 10.1 a) Enhance areas are defined at page 151 of the Characterisation Study, Chapter 7 (EB015). As set out in the Council's response to matter question 3.3, the majority of the borough falls within the 'enhance' character area, including significant sections of existing urban development that is not allocated in the plan. Therefore, policy N8 part 1 responds to the need to balance between the more significant areas of transformation identified through the site allocations, and the remaining non-allocated parts of the neighbourhood where development will be more incremental.
- 10.2 The Council notes that a small part of site allocation N8.SA1 Stratford Central is within 'enhance' area – frontages to the south of the St John's Conservation Area. This area is also within TBZ18: Stratford High Street recognising its opportunity for growth, albeit through a moderate uplift in density and at the lowest permitted tall building heights in the borough, with opportunities for tall elements up to 40m.
- 10.3 b) The Council considers the tall building requirements of the site allocations within the Stratford and Maryland neighbourhood to be justified, effective and in conformity with the London Plan policy D9 (Tall buildings).
- 10.4 The site allocations design principles result from an assessment that also address design-led approach considerations in line with London Plan policy D3 and D1 which includes heritage

- considerations. Further details on this can be found in Chapter 7 “Supporting optimisation of sites” and Chapter 8 “Impact on conservation area and heritage assets” of the Tall Building Topic Paper (2025) (TP001). The assessment of N8 Stratford and Maryland is set out in Chapter 8 Vision Neighbourhood Principles part 2 of Newham Characterisation Study, p.215 (2024) (EB017).
- 10.5 As set out in the Tall Building Annex (2024) p. 35 (EB023) and stated at paragraph 10.10 of the Tall Buildings Topic Paper (2025) (TP001), the impact of tall buildings on historic assets has informed the tall buildings strategy and the design requirements of site allocations, which require lower height parameters outside Stratford Metropolitan Centre in order to balance the neighbourhood opportunity for growth with the need to enhance and protect the setting of St John’s Conservation area. Further details on the justification of this approach can be found in the chapter ‘Impact on Conservation area and heritage assets’ of the Tall Buildings Topic Paper (2025).
- 10.6 The approach to providing a range of prevailing heights and maximum height parameters enables the most appropriate scale and form of development whilst sensitively integrating with the existing context. However, tall buildings developments are also subject to a detailed townscape analysis during the pre-application process to avoid harm to the heritage assets. Further details on the justification for maximum height and prevailing height parameters can be found in chapter 2 ‘Flexibility within tall buildings’ of the Tall Buildings Topic Paper (2025).
- 10.7 This site allocation development scenarios have been tested for viability and deliverability through the Plan Viability Assessment (EB099), please see the Council overall response to Q1.10 (Matter 1). The site allocations will work alongside Local Plan policy D4 (Tall buildings), D7 (Conservation Areas and Areas of Townscape Value), D9 (Designated and non-designated buildings, ancient monuments and historic parks and gardens), H3 (Affordable Housing) and BFN4 (Developer contributions and infrastructure delivery) which address how the viability of sites, on a case by case basis, will be considered and assessed.
- 10.8 c) The design requirements for the 10 site allocations within N8 Stratford and Maryland Neighbourhood are drawn from the neighbourhood vision set out in the Chapter 8 Vision Neighbourhood Principles part 2 of Newham Characterisation Study (2024) p.215 (EB017), and from the design principles finalised in Site Capacity Study Summary (examination documents ED003a, ED003b).
- 10.9 The site allocation maps provide an illustrative representation of how the design requirements could be delivered to reflect the neighbourhood’s vision. Where employment uses are required to re-provide existing employment uses [N8.SA10 Chobham Farm North], the map indicates the best location of industrial buffering. However, we acknowledge that the optimal layout of developments will be discussed and agreed at detailed design stage through masterplanning and planning application process.
- 10.10 d) Policy N8 sets out a positive strategy for the town centre in accordance with paragraph 85 of the NPPF and London Plan Policy SD7(B). Policy N8 seeks to ensure that the appropriate balance of uses is delivered by having regard to its Town Centre location.
- 10.11 The extant planning permissions are for a mix of uses, including residential, hotel, commercial, student accommodation, light industrial and community use. N8.SA1 to N8.SA10 seeks to deliver similar type of uses but more of an appropriate scale to its designation, and sensitive to part of its location. The policies also seek to ensure that the design principles deliver an improved public realm with better permeability to address severance across the neighbourhood as set out in the Chapter 8 Vision Neighbourhood Principles part 2 of Newham Characterisation Study (2024) (EB017). It looks to deliver key infrastructure alongside growth to mitigate its impact thereby achieving sustainable development in the Stratford and Maryland neighbourhood.

- 10.12 e) Yes, this figure broadly aligns with the Regulation 19 Housing Trajectory (1,195 homes). However, the phasing period for this site is not 2025 to 2038 but 2023 to 2038 (short to long term).
- 10.13 Site allocation N8.SA1 is justified and positively prepared, with the housing figure having been informed by the following planning permissions across two individual sites which make up the wider site allocation: site 1: 18/03088/FUL S05 (423 homes approved, not started), site 2: 20/02402/RECOU (7 homes approved, under construction) and the capacity testing undertaken through Newham's Characterisation Study (765 homes).
- 10.14 f) Yes, this figure and the phasing period (short - long term) broadly aligns with the Regulation 19 Housing Trajectory (1,311 homes).
- 10.15 Site allocation N8.SA2 is justified and positively prepared, with the housing figure having been informed by the following planning permission: 21/00483/FUL (286 homes approved, not started) and the capacity testing undertaken through Newham's Characterisation Study (1,025 homes).
- 10.16 g) Yes, this figure and the phasing period (medium - long term) broadly aligns with the Regulation 19 Housing Trajectory (1,311 homes).
- 10.17 Site allocation N8.SA3 is justified and positively prepared, with the housing figure having been informed by the following planning permission: 22/00360/OUT (1,311 Resolution to Grant).
- 10.18 h) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (153 homes).
- 10.19 Site allocation N8.SA4 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.
- 10.20 i) Yes, this figure and the phasing period (short - long term) broadly aligns with the Regulation 19 Housing Trajectory (2,776 homes).
- 10.21 Site allocation N8.SA5 is justified and positively prepared, with the housing figure having been informed by the following planning permissions across two individual sites which make up the wider site allocation: site 1: 18/00470/OUT (600 homes approved, under construction), site 2: 19/00391/FUL (380 homes approved, under construction) and the capacity testing undertaken through Newham's Characterisation Study (1,796 homes).
- 10.22 j) Yes, this figure and the phasing period (medium term) aligns with the Regulation 19 Housing Trajectory (500 homes).
- 10.23 Site allocation N8.SA6 is justified and positively prepared, with the housing figure having been informed by the following planning permissions: site 17/00235/OUT & 18/00425/REM (500 homes approved, under construction).
- 10.24 k) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (389 homes).
- 10.25 Site allocation N8.SA7 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study.
- 10.26 l) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (677 homes).
- 10.27 Site allocation N8.SA8 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (677 homes).

- 10.28 m) Yes, this figure and the phasing period (short – medium term) broadly aligns with the Regulation 19 Housing Trajectory (2,108 homes).
- 10.29 Site allocation N8.SA9 is justified and positively prepared, with the housing figure having been informed by the following planning permissions across five individual sites which make up the wider site allocation: site 1: 20/00307/FUL (457 homes approved, not started), site 2: 21/00574/OUT (948 homes approved, not started), site 3: 21/00395/FUL (196 homes approved, not started), site 4: 23/00305/FUL (126 homes, Resolution to Grant), site 5: 21/00455/FUL (173 homes approved, under construction) and the capacity testing undertaken through Newham’s Characterisation Study (208 homes).
- 10.30 n) Yes, this figure and the phasing period (short – medium term) broadly aligns with the Regulation 19 Housing Trajectory (208 homes).
- 10.31 Site allocation N8.SA10 is justified and positively prepared, with the housing figure having been informed by the following planning permission: 12/00146/FUM (208 homes approved, not started).

N9 West Ham

Q4.11 Are policies N9 and N9.SA1 justified and will they be effective in helping to achieve sustainable development in the West Ham neighbourhood? In particular:

- a) The requirement for a pedestrian bridge over the rail tracks onto the southern corner of the site.
- b) The assumption that around 320 homes will be built on N9.SA1 between 2028 and 2033.

Council Response:

- 11.1 a) The southern boundary of West Ham neighbourhood is severed by railway lines and the Greenway. The Council considers that a pedestrian bridge over the rail tracks onto the southern corner of the site would reduce severance and improve connections to green space for residents, with the Greenway allowing for walking and cycling to large areas of the borough. The connection from the site to the Greenway is part of the existing site allocation, and the bridge over the railway tracks follows feasibility work undertaken during planning application 21/03194/OUT (application was later withdrawn).
- 11.2 Additional access points to the Greenway are justified as it is informed by the Sustainable Transport Strategy (EB093, pages 55-56 and 62) and will be effective in connecting residents to green infrastructure and reduction severance in West Ham.
- 11.3 b) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (319 homes).
- 11.4 Site allocation N9.SA1 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham’s Characterisation Study (319 homes).

N10 Plaistow

Q4.12 Are policies N10 and N10.SA1 to N10.SA4 justified and will they be effective in helping to achieve sustainable development in the Plaistow neighbourhood? In particular:

- a) The assumption that around 40 homes will be built on N10.SA1 between 2033 and 2038.
- b) The assumption that around 200 homes will be built on N10.SA2 between 2028 and 2033.
- c) The assumption that around 140 homes will be built on N10.SA3 between 2033 and 2038.
- d) The assumption that around 50 homes will be built on N10.SA4 between 2028 and 2033.

Council Response:

- 12.1 a) Yes, this figure and the phasing period (long term) broadly aligns with the Regulation 19 Housing Trajectory (44 homes).
- 12.2 Site allocation N10.SA1 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (44 homes).
- 12.3 b) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (201 homes).
- 12.4 Site allocation N10.SA2 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (201 homes).
- 12.5 c) Yes, this figure and the phasing period (long term) broadly aligns with the Regulation 19 Housing Trajectory (141 homes).
- 12.6 Site allocation N10.SA3 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (141 homes).
- 12.7 d) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (51 homes).
- 12.8 Site allocation N10.SA4 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (51 homes).

N11 Beckton

Q4.13 Are policies N11 and N11.SA1 to N11.SA3 justified and will they be effective in helping to achieve sustainable development in the Beckton neighbourhood? In particular:

- a) The requirement relating to the layout and design of industrial development on site N11.SA3.
- b) The requirement in N11 part 12 relating to mitigating odour impacts from Beckton sewage treatment works in relation to allocation N11.SA3.
- c) The assumption that around 1,160 homes will be built on N11.SA1 between 2028 and 2038.
- d) The assumption that around 215 homes will be built on N11.SA2 between 2027 and 2028.
- e) The assumption that around 700 homes will be built on N11.SA3 between 2028 and 2038

Council Response:

- 13.1 a) The proposed industrial development on the site is adjacent London Industrial Park SIL, which is predominantly occupied by small to medium sized storage and distribution units

- with high volume of traffic movement to and from the estate taking access from Woolwich Manor Way. This requirement is to buffer off nuisance from the SIL as recommended in the design-led capacity testing (ED003b).
- 13.2 Non-residential stacked light industrial building with separate HGV and pedestrian access is considered as the most appropriate typology as concluded in Chapter 9 of the Characterisation Study (EB019). The buffer building also provides employment capacity to meet the imminent industrial demand in the borough as evidenced by the Employment Land Review 2022 (EB048). These are in line with the London Plan's requirements in meeting industrial needs and managing relationship between residential and industrial uses in Policy E4, E5 and E7.
 - 13.3 These locational and design requirements are tested feasible and viable through the capacity study and viability assessment (EB099). The detail layout and typology of industrial development will be discussed and agreed at detailed design stage through masterplanning and planning application process.
 - 13.4
 - 13.5 b) This requirement addresses the agent of change principle in the vicinity of the existing Beckton Sewage Treatment Works, which is consistent with London Plan Policy D13 and supported by evidence.
 - 13.6 The N11.SA3 Alpine Way site allocation is located within 800m of BSTW, inside Thames Water's consideration zone, as defined in their guideline "Risk assessment for odour encroachment".
 - 13.7 Recognising the importance of ensuring the Local Plan is positively prepared and consistent with the London Plan, we proposed modifications (SD004) to include this requirement in the site allocation (MO94.5). Additionally, we proposed to include the requirement that any necessary mitigations have to be completed ahead of occupation of development in both the neighbourhood policy (MO94.4) and site allocation (MO94.6).
 - 13.8 c) Yes, this figure and the phasing period (medium - long term) aligns with the Regulation 19 Housing Trajectory (1,160 homes).
 - 13.9 Site allocation N11.SA1 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (1,160 homes).
 - 13.10 d) Yes, this figure and the phasing period (short term) broadly aligns with the Regulation 19 Housing Trajectory (51 homes).
 - 13.11 Site allocation N11.SA2 is justified and positively prepared, with the housing figure having been informed by the following planning permission: HSG24 (215 homes approved, Resolution to Grant).
 - 13.12 e) Yes, this figure and the phasing period (medium - long term) broadly aligns with the Regulation 19 Housing Trajectory (707 homes).
 - 13.13 Site allocation N11.SA3 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (707 homes).

N12 East Ham South

Q4.14 Is policy N12 justified and will it be effective in helping to achieve sustainable development in the East Ham South neighbourhood?

Council Response:

- 14.1 Yes, policy N12 sets out a vision for East Ham South to continue to be a green and residential neighbourhood that will achieve sustainable development through incremental change, with new housing enhancing the neighbourhood's existing character as set out in Chapter 8 of Newham's Characterisation Study 2024.
- 14.2 This policy set out a list of statements and requirements that are positive, justified and effective strategy for achieving this vision including how development that provides a mix of uses and continue to the vibrancy of local centres and optimising and intensifying industrial locations will be supported to contribute to the sustainable residential and commercial growth potential identified in the London Plan.
- 14.3 The Retail and Leisure Study (2022) identifies the importance of local centres, including Boleyn and High Street South which are located in the East Ham South neighbourhood. These are recognised as essential in promoting strong and sustainable neighbourhoods as set out in the paragraph 96 of NPPF (2023).

N13 East Ham

Q4.15 Are policies N13 and N13.SA1 to N13.SA3 justified and will they be effective in helping to achieve sustainable development in the East Ham neighbourhood? In particular:

- a) Whether up to date, adequate evidence demonstrates that site N13.SA3 passes the sequential and exceptions test and the policy requirements will ensure that the development proposed will be safe from flooding for its lifetime.
- b) The assumption that around 140 homes will be built on N13.SA1 between 2033 and 2038.
- c) The assumption that around 85 homes will be built on N13.SA2 between 2028 and 2033.
- d) The assumption that around 250 homes will be built on N13.SA3 between 2028 and 2038.

Council Response:

- 15.1 a) N13.SA3 is justified by Newham's Site Allocations Sequential Test (2025) (EB090). The site passes the Sequential Test, as demonstrated in Appendix 1 (p.77) (N13.SA3), where it is shown that there are no reasonable alternative sites of lower flood risk that can deliver the same strategic objectives. The site is located within Flood Zones 2 and 3 and is also subject to pluvial flood risk and potential risk from a breach of the Thames defences. As such, the site is considered to be at high flood risk, and therefore the Exception Test is required.
- 15.2 The Exception Test has been applied in accordance with the National Planning Policy Framework (NPPF 2023) (paragraphs 159–169) and Planning Practice Guidance (PPG). The Strategic Flood Risk Assessments (Level 1 and 2) (EB78-89) prepared by JBA Consulting, and endorsed by the Environment Agency, provide an adequate and up-to-date evidence base.
- 15.3 The site allocation N13.SA3 passes Exception Test part a), which requires that it must demonstrate that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA and the LPR IIA. The site allocation N13.SA3 also passes Exception Test part b), which requires all sites' Flood Risk Assessments to

demonstrate that the development will be safe for its lifetime (based on the key measures detailed in the SFRA Level 2 (2025)), without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

- 15.4 The requirement for N13.SA3 to be informed by a site Specific Floor Risk Assessment and to ensure that the flood risk is minimised and mitigated through the design and layout of the site is justified.
- 15.5 b) No, this figure does not align with the Regulation 19 Housing Trajectory, which over this phasing period (2033 – 2038, long term) shows this site delivering 63 homes.
- 15.6 Over the longer phasing period 2023 – 2038 (short – long term), the housing trajectory shows that this site will deliver 138 homes, which broadly aligns with the site capacity figure referred to in this question.
- 15.7 Site allocation N13.SA1 is justified and positively prepared, with the housing figure having been informed by the following planning permission: 20/02264/FUL (75 homes approved, under construction) and the capacity testing undertaken through Newham's Characterisation Study (63 homes).
- 15.8 c) Yes, this figure and the phasing period (medium term) aligns with the Regulation 19 Housing Trajectory (85 homes).
- 15.9 Site allocation N13.SA2 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (85 homes).
- 15.10 d) Yes, this figure and the phasing period (medium – long term) broadly aligns with the Regulation 19 Housing Trajectory (246 homes).
- 15.11 Site allocation N13.SA3 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (246 homes).

N14 Green Street

Q4.16 Are policies N14 and N14.SA1 justified and will they be effective in helping to achieve sustainable development in the Green Street neighbourhood? In particular, the assumption that around 40 homes will be built on N14.SA1 between 2028 and 2033.
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Council Response:

- 16.1 Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (43 homes). This is the version of the Housing Trajectory that informed the Regulation 19 Draft Submission Local Plan submitted to the Planning Inspectorate.
- 16.2 Site allocation N14.SA1 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (43 homes). The capacity testing methodology, detailed in Chapter 3 of Newham's Site Allocation and Housing Trajectory Methodology (2025), takes a design-led approach and, as such, is consistent with London Plan Policy D3 and with the London Plan Guidance on site optimisation.

N15 Forest Gate

Q4.17 Are policies N15, N15.SA1 and N15.SA2 justified and will they be effective in helping to achieve sustainable development in the Forest Gate neighbourhood? In particular:

- a) The assumption that around 40 homes will be built on N15.SA1 between 2028 and 2033.
- b) The assumption that around 160 homes will be built on N15.SA2 between 2025 and 2038.

Council Response:

- 17.1 a) Yes, this figure and the phasing period (medium term) broadly aligns with the Regulation 19 Housing Trajectory (37 homes).
- 17.2 Site allocation N15.SA1 is justified and positively prepared, with the housing figure having been informed by the capacity testing undertaken through Newham's Characterisation Study (37 homes).
- 17.3 b) Yes, this figure and the phasing period (short – long term) broadly aligns with the Regulation 19 Housing Trajectory (157 homes).
- 17.4 Site allocation N15.SA1 is justified and positively prepared, with the housing figure having been informed by the following planning permissions: 20/02849/FUL (78 homes approved, not started) and the capacity testing undertaken through Newham's Characterisation Study (79 homes).

N16 Manor Park and Little Ilford

Q4.18 Is policy N16 justified and will it be effective in helping to achieve sustainable development in the Manor Park and Little Ilford neighbourhood?

Council Response:

- 18.1 Yes, Policy N16 sets out a vision that supports incremental change with new development enhancing the neighbourhoods' existing character. Supporting accessible active travel routes and improved public transport connections as set out in the list of wider sustainable transport projects in the Newham Sustainable Transport Strategy (2024) (page 101).
- 18.2 As well as optimising and intensification of industrial land as set out in the Employment Land Review (2022). This policy sets out justified and effective strategy in encouraging significant levels of growth and sustainable development in accordance paragraph 85, 86 and 87 of the NPPF (2023) and London Plan policy E7.