



Quod

R22 Local Plan

Matter 2: Amount of development required in the plan period

Newham Local Plan

St William Homes LLP

NOVEMBER 2025

Matter 2: Amount of development required in the plan period

- 1.1 On behalf of St William Homes LLP ('St William'), Quod submits this hearing statement in respect of Matter 2 Amount of development required in the plan period. This hearing statement responds to IN3 'Inspector's matters, issues and questions, written statements; and hearings programme issued by the Inspector on 9th October 2025.
- 1.2 St William have submitted representations to the Regulation 18 (R18) Issues and Options stage in February 2023, and further representations at the Regulation 19 (R19) Draft Local Plan consultation stage in September 2024. Our client continues to be engaged at the Regulation 22 (R22) Stage ('the Plan') and will expand on the matters raised in their previous representations within this hearing statement where necessary.

Plan Period

Q2.1(a) Are the reasons given by the Council sufficient justification for the strategic policies in the Plan looking ahead 11 years from adoption? (b) If not, should the Plan be modified so that the strategic policies look ahead to 2042?

- 1.3 The Mayor of London has confirmed that "the current London Plan does not meet London's identified need" and is working towards "delivering 88,000 homes per annum as calculated at a national level through the standard method". The London Plan is now out of date and does not meet London's housing need and furthermore should not be relied upon to reduce housing capacity over the plan period.
- 1.4 St William therefore agree with the Council that in line with the Framework¹ it is essential that the new Local Plan is reviewed at the 5 year review point as the housing targets set in the draft Local Plan (based on the current London Plan) will be out of date as soon as the new London Plan is adopted (expected to be 2027). The Mayor of London recommends that "there is flexibility in the draft Plan to safeguard this eventuality". We therefore welcome the Council's approach to undertake a further refresh at the 5 year review point as set out at paragraph i.10. However, we do not necessarily consider it necessary that the Local Plan period should be shortened. This is be contrary to the Framework² which states that strategic policies should look ahead over a minimum 15-year period from the date of adoption to anticipate and respond to long-term requirements and opportunities. On the basis that Policy H1 is a strategic policy it is considered that it should look ahead to 2042 in line with the Framework and as recommended by the Mayor of London it is more important that the new Local Plan incorporates sufficient flexibility to respond to changing circumstances than have a shorter Plan period.

¹ Framework paragraph 34

² Framework paragraph 22

- 1.5 We therefore see no justification for Newham to adopt a Local Plan with a shorter timeframe than other boroughs within Greater London.

Housing requirement in the submitted plan for 2023 to 2038

Q2.2(a) Does policy H1 and/or the reasoned justification need to be modified to clarify what the Plan's minimum housing requirement is (irrespective of the specific figure)?

(c) Is the reference to a target range justified and does it provide an effective and unambiguous approach (irrespective of the specific figures)?

- 1.6 We consider that adopting a range for the minimum Local Plan housing requirement is ambiguous and an unsound approach. Paragraph 62 of the Framework refers to a minimum number of homes (singular) to be determined, the Council's current approach would therefore be contrary to the Framework.
- 1.7 We note the Council's response to the Inspector³ which sets out their intention to adopt the lower housing requirement as their minimum housing target despite acknowledgement that there are a number of site allocations and strategic sites across the borough that are capable of optimisation of capacity through a design led approach. The upper housing target set out in the draft Local Plan is based on a knowledge of optimised sites and therefore it is unclear why the higher housing target would not be adopted instead. There will inevitably be a number of other sites not currently known to the Council that may be capable of design led optimisation over time and therefore in the context of the significant housing crisis and desperate need for more housing it is unclear why a more ambitious housing target is not proposed. As the Council note themselves⁴ "the purpose of the higher range trajectory is to set out our aspirations for optimising site allocations across the borough and positively plan for these outcomes through the site allocation requirements".
- 1.8 A higher minimum housing target would enable a more positive approach to housing delivery to be taken in particular because the previous (or current) plan failed to successfully create a planning framework to achieve the minimum threshold of 75% Housing Delivery Test (only achieving 61% in the most recent HDT⁵) and the Council are unable to demonstrate a 5 YHLS – just 2.22 years⁶. Furthermore, the new London Plan will be adopting significantly higher housing targets based on the new standard method which reflects current housing need and aligns with government policy and guidance and based on the Council's requirement to produce a Local Plan that complies with the London Plan it is considered that the Council should forecast for or incorporate sufficient flexibility in the plan and in their new housing targets to account for these impending changes. It must therefore include a review mechanism once the London Plan is adopted to plan to incorporate the Government's standard method of housing delivery, otherwise a new threshold will be operational thereby superseding any local Newham policy⁷.

³ ED001

⁴ ED001

⁵ Housing Delivery Test: 2023 Measurement - Published 12th December 2024

⁶ ED058 paragraph 4.7.2

⁷ Framework Paragraph 11(d)

- 1.9 Additionally, adopting the higher minimum target would also be consistent with part 2 of Policy H1 which promotes a design-led approach that seeks to optimise site capacity for the delivery of residential units. The policy justification explicitly states that “developments will need to optimise the delivery of homes.” The Council’s proposal to adopt the lower housing requirement would therefore be inconsistent with national objectives and the intent of Policy H1.
- 1.10 Overall, it is unclear whether the target is intended to be flexible or definitive, and whether the higher figure should be pursued to better meet housing demand. The reference to a range introduces unnecessary uncertainty in the Plan’s strategy for housing and undermines the effectiveness of this strategic policy, meaning it fails to accord with the Framework which requires plans to clarify identify housing needs and how they will be met⁸. Additionally, the Council’s intention to adopt the lower figure goes against the narrative of their strategic housing policies and the Framework⁹ which advocates for optimisation and allows for requirements higher than identified need.
- 1.11 We therefore recommend that the Council adopt a single, clearly defined, needs-based housing requirement figure in Policy H1, with any flexibility explained in the supporting text. There is a genuine probability that this approach will restrict housing delivery further beyond the critical constraints that currently exist. As presently drafted, the approach cannot be considered sound under the terms of the Pennycook¹⁰ letter to PINS.
- (b) Is the approach of basing the housing requirement (irrespective of the specific figure) on capacity, rather than need, justified and consistent with the London Plan?*
- 1.12 The Council’s approach of basing the housing requirement on capacity rather than need is consistent with the adopted London Plan, but does not align with the standard methodology in which the London Plan is being reviewed against. The standard method identifies a minimum annual housing needs figure and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area¹¹.
- 1.13 Irrespective of the housing figure, the new Local Plan housing target should be a needs-based figure to be consistent with the new standard method and forthcoming new London Plan if it is to be effective in its housing delivery. In line with our comments above and in respect of NPPF Paragraph 69, the Council should establish a figure which is reflective of their identified housing need across the plan period.
- 1.14 Without clear alignment to assessed housing need, the Plan risks under-delivery and may not meet the requirements of NPPF Paragraphs 61–62. We recommend that the Council’s approach be reviewed in light of the most recent updates to the standard method for calculating housing need, to ensure alignment with national guidance and the Framework.

⁸ Framework paragraph 61

⁹ Framework paragraph 69

¹⁰ Matthew Pennycook MP Minister of State for Housing and Planning letter of 9th October 2025 to Paul Morrison Chief Executive The Planning Inspectorate

¹¹ PPG Paragraph 002 Reference ID: 2a-002-20241212

(d) Is the inclusion of a stepped requirement (irrespective of the specific figures) consistent with national policy and guidance?

- 1.15 Yes, PPG guidance¹² outlines and explains how stepped housing requirements work noting that it “may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period”. St William agrees that a stepped trajectory is an appropriate approach for Newham as it can account for complex, strategic phased sites many of which will be delivered over long periods of time and/or are contingent on the delivery of strategic infrastructure.

(e) If a stepped trajectory is justified (irrespective of the specific figures), does the Plan need to be modified to include it in policy H1 rather than in the reasoned justification to be consistent with national policy and guidance?

- 1.16 On the basis that PPG states that stepped requirements need to ensure that planned housing requirements are met fully within the plan period, the Plan should be modified to include the stepped trajectory in policy H1 particularly as the trajectory figures have the potential to impact the 5YHLS.

London Plan target 2019 to 2029

*Q2.3 To be consistent with the London Plan, does policy H1 and/or the reasoned justification need to be modified to include reference to the London Plan target of 47,600 homes for 2019 to 2029 and/or to a residual target of 35,954 homes for 2023 to 2029 (irrespective of whether the evidence demonstrates that actual delivery will be lower in those periods)?**

**The Inspector notes that Q2.3 relates only to the principle of whether the Plan should refer to the London Plan target and defers discussions on the justification of the housing target within Matter 4 (Neighbourhoods and Allocations).*

- 1.17 The Mayor of London has advised that paragraph 4.1.11 of the London Plan is “now considered out of date” and that it should not be relied upon to reduce housing capacity over the plan period. Furthermore, even if the Local Plan was to align itself with the London Plan, the housing targets in the Local Plan may only be in place for a short period and would be out of date once the new London Plan is adopted. It is therefore not considered appropriate to update policy H1 to refer to the London Plan target. Furthermore, the current London Plan is based on capacity whereas the new London Plan, the standard methodology and NPPF require housing targets to be based on need.
- 1.18 The Mayor has recognised this for the purposes of the London Plan Review and is seeking to significantly boost housing delivery in accordance with the new standard method. The recently published ‘Towards a new London Plan’ (May 2025) consultation document identifies a target of 88,000 new homes per annum across London. If this is to be achieved, all London Boroughs must work together collaboratively. At this stage, the draft Local Plan does not seek to meet the Government’s standard method of housing which identifies a greater housing need.

¹² PPG Paragraph: 012 Reference ID: 68-021-20190722

1.19 Therefore, we recommend that Newham must review its housing targets to align with the new standard method promoted via 'Towards a new London Plan'.