



Statement of Common Ground

Between

London Borough of Newham

And

Greater London Authority

Stage: Newham Submission Draft Local Plan (Reg. 22)

Date: 24 November 2025

1. Executive Summary

- 1.1. A statement of common ground is a written record of the progress made by plan-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process. It is also a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.
- 1.2. This Statement of Common ground addresses Newham's response to comments received from the Mayor of London on the Newham Submission Draft Local Plan (Regulation 19) stage, and the Greater London Authority's position on this response. Further background to the duty to cooperate engagement on key strategic matters between the two signatories, as relevant to the preparation of the Newham Submission Draft Local Plan and its progression to public Examination, is provided in Appendix 2.
- 1.3. Strategic matters overseen by other organisations will be addressed in other SoCGs, in order to streamline the process of reaching agreements with each party. Where key strategic issues overlap between different organisations that Newham have signed statements of common ground with (e.g. the delivery of housing targets), these interrelations are summarised in the [Duty to Cooperate Statement](#) (2024) and the [Duty to Cooperate Addendum](#) (2025).
- 1.4. The document is intended to be 'live', updated as circumstances change. Please see the Governance Arrangements section of the statement for more details.

2. Parties Involved

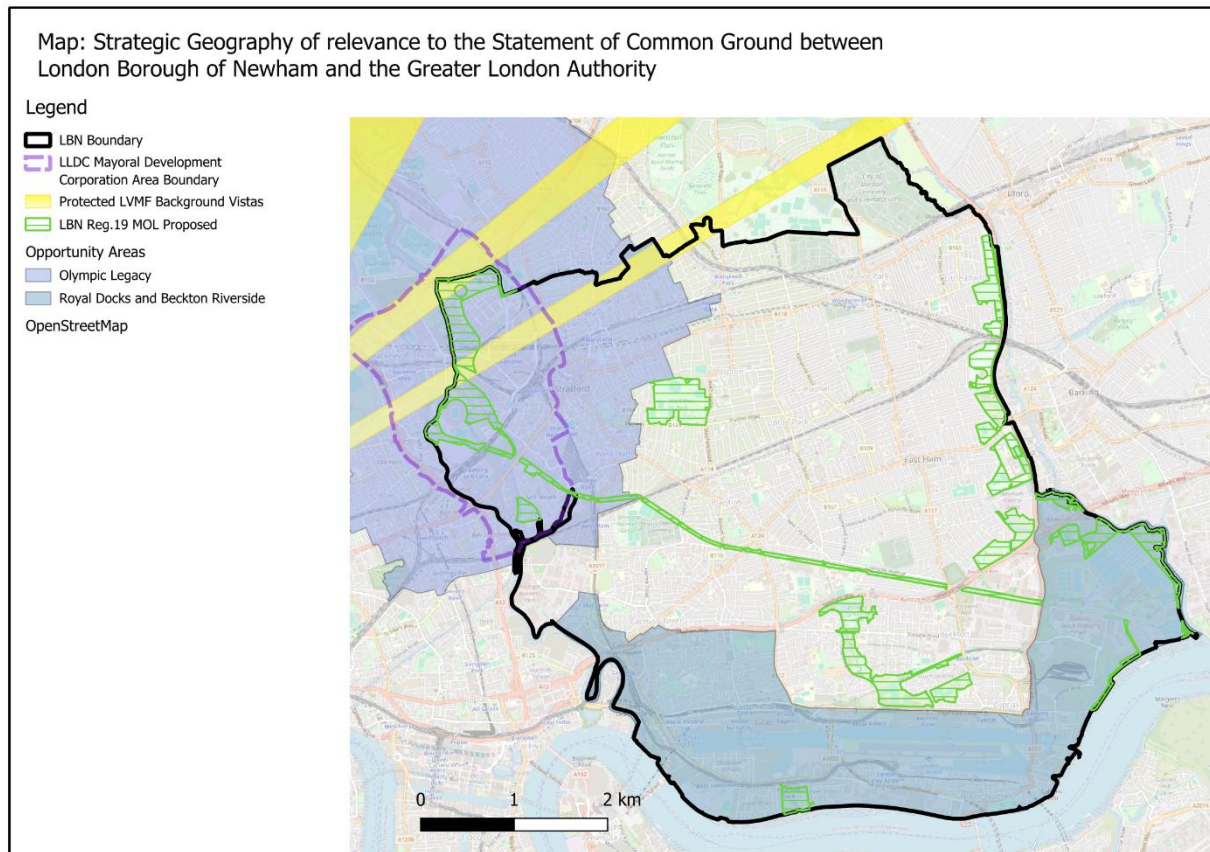
- 2.1. Newham Council, the Local Planning Authority for the London Borough of Newham, which is an inner London Borough in East London situated between three rivers: the Lea to the west, Thames to the south and Roding to the east. London Borough of Newham is bordered by several other London Boroughs, including Tower Hamlets, Hackney, Waltham Forest, Redbridge, and Barking and Dagenham. Across the River Thames lies the Royal Borough of Greenwich.

AND

- 2.2. The Greater London Authority (GLA), the Strategic Planning body responsible for creating a London-wide spatial development strategy, known as the London Plan. This sets out an integrated economic, environmental, transport and social framework for the development of London.
- 2.3. The London Legacy Development Corporation (LLDC) Mayoral Development Corporation returned planning powers back to the London Boroughs of Newham, Tower Hamlets and Waltham Forest and Hackney on the 1st of December 2024. As such, key strategic matters for the parts of the LLDC that fall within Newham's administrative boundaries are also addressed in the new Newham Draft Submission Local Plan, and are subject to the matters addressed in this statement of common ground.

3. Strategic geography

- 3.1. The map below identifies the spatial representation of the key strategic matters addressed, alongside the administrative area of the plan-making authority – London Borough of Newham.



- 3.2. As noted above, the LLDC returned planning powers back to the London Borough of Newham on the 1st of December 2024. Where relevant, the Newham draft Local Plan has retained and evolved site allocations and designations from the LLDC Local Plan (2020).
- 3.3. Newham is strategically located at the intersection of the London-Stansted-Cambridge-Peterborough Corridor, which is centred on enterprise and innovation within emerging sectors such as digital, media, life sciences, telecommunications and advanced manufacturing, and the Thames Estuary Creative and Cultural Industries Corridor, which adds to the borough's significance. The borough also contains three Opportunity Areas set out in the London Plan (2021): the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.

4. Background

- 4.1. Newham Council prepared the Submission Draft Local Plan and published it for consultation between 19th July and 20th September 2024. This is the version of the plan that the Council considers to be 'legally compliant' and 'sound' and this was submitted to the Planning Inspectorate for examination in July 2025. The council undertook two rounds of consultation prior to this, to inform the Newham Submission Draft Local Plan. These were:
- Issues and Options Consultation, which took place between 18 October and 17 December 2021; and
 - Draft Local Plan Consultation (Regulation 18), which took place between the 9 January and 20 February 2023.
- 4.2. A [Duty to Cooperate Statement](#) (DtC Statement) was published as part of Newham's Regulation 19 consultation, which provides a summary of London Borough of Newham's engagement with the GLA, as a duty to cooperate partner, as part of the preparation of the new Newham Local Plan. The table below provides an extract of the relevant key strategic matters identified as part of this process and the corresponding paragraphs in the Duty to Cooperate Statement.

Key Strategic Matter	DtC Statement relevant paragraphs
Housing target delivery	4.26-4.28, 4.32, 4.33, 4.36-4-38
Gypsy and Traveller need	4.42, 4.43, 4.47-4.50
Employment land demand	4.55-4.57, 4.61 4.74
Safeguarded Wharves	4.65, 4.74
Land swap along Bidder Street SIL	4.66-4.67, 4.73, 4.74
Newham's Town Centres Network	4.84-4.86, 4.88, 4.90, 4.98
Beckton Riverside capacity and DLR extension	4.102 - 4.109
Beckton Sewage works odour	4.160-4.166
Sub-regional Integrated Water Management Strategy	4.171-4.176
Tall buildings strategy and protected vistas	4.254-4.267
Metropolitan Open Land review	4.286, 4.287, 4.294-4.295

- 4.3. The national and regional policy context forming the background to this statement of common ground is also detailed in the Duty to Cooperate Statement (2024), under 'Chapter 2: Legislative and national policy context' and 'Chapter 3: Demonstrating compliance with the duty to cooperate'.
- 4.4. During the Regulation 19 consultation process, the GLA submitted comments to Newham that raised the following:
- 4.4..1. General conformity issues:
- Newham's housing targets prior to 2029; and
 - Newham's affordable housing approach.
- 4.4..1. And additional matters:
- The publication of capacity figures for each site allocation
 - Prioritisation of developer contributions towards public transport;

- The approach to employment land;
 - The height parameters of tall building zones;
 - Waste management capacity as part of site allocations; and
 - How air quality issues are addressed in neighbourhood policies.
- 4.5. Following review of the above matters, London Borough of Newham invited the GLA to begin discussions towards the signing of this Statement of Common Ground. As no further issues were raised by the Mayor of London in relation to Newham's Town Centres Network, safeguarded wharves, or the need for a sub-regional Integrated Water Management Strategy, these matters are deemed to have been adequately addressed as part of the Submission Draft Local Plan and are not discussed further in this statement of common ground.
- 4.6. A meeting was held on 24th January 2025 to discuss the key strategic matters, and the agenda and notes of this meeting are attached as Appendix 1 and provide further background information. During this meeting, Newham raised a further key strategic matter, which is that it would be useful for the SoCG to clarify the methodology behind the Strategic Housing Land Availability Assessment (SHLAA) that the GLA is currently developing, given expected publication of early new SHLAA findings in 2025 / early 2026. The SHLAA process is still ongoing, with Newham (and other boroughs) and the GLA working closely together on the assumptions and emerging data. Further background to this is included in Appendix 2.
- 4.7. Following the meeting, Newham shared its draft responses to GLA's Regulation 19 consultation comments and additional employment evidence for consideration, and further written engagement took place, alongside further meetings in August and October 2025 to discuss the changing position on Newham's housing delivery. As part of these meetings an updated housing trajectory was provided by Newham, reflecting a five-year land supply period of 2027/28 to 2031/32.

5. Newham's response and position on the Mayor of London's Regulation 19 comments

- 5.1. The table below provides Newham's response and position on the issues raised by the Mayor of London in the Regulation 19 comments, alongside the Mayor of London's updated response and position.
- 5.2. Further background to the issues and themes discussed is provided in Appendix 2. This sets out in more detail the range of discussions between Newham and the GLA, under the duty to cooperate, and supporting additional data, which led to Newham's response to the Mayor of London's Regulation 19 comments. For ease of reference and continuity, the sections of the appendix are titled using the headlines in the [Duty to Cooperate Statement](#) (2024) and the [Duty to Cooperate Addendum](#) (2025).

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
Reg19-E-015/002	Vision and objectives	General The draft Local Plan is underpinned by seven broad objectives. These ambitions include a healthier Newham, ageing well, and people friendly neighbourhoods with green and clean streets. The objectives are very closely aligned with the Mayor's Good Growth objectives, especially GG1 building strong and inclusive communities and GG3 creating a healthy city.	Comment noted.	N/A
Reg19-E-015/004	H1 Meeting Housing Needs	However, it is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan for two reasons: · firstly, the intention to alter the borough's housing targets prior to 2029 so that it is lower than the one established in the LP2021; and [· secondly the proposed approach to affordable housing.] Further detail on these is provided in the subsequent sections of this letter.	Comment noted. Our response to this issue, which supersedes the response set out in the 'Newham Local Plan Refresh Regulation 19 Consultation Report: Homes Comments' submitted for examination, is set out fully in response to the relevant representations below – relevant references: Reg19-E-015/006, Reg19-E-015/007, and Reg19-E-015/008. Newham is now proposing to amend the Local Plan housing target period to cover the years post-adoption, from 2027/28 to 2041/42. For the first two years of the plan period, the years which overlap with the London Plan period, Newham intends to set their target at 4,760 homes per year to align with the London Plan target.	The Mayor welcomes the proposed changes from LBN in relation to their housing target and supports the inclusion of the LP2021 housing target until 2028/2029. Subject to these changes, the Mayor no longer considers there to be a general conformity issue in relation to housing targets.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			Although delivery in the years prior to this show a shortfall of delivery against the London Plan target, it is proposed by Newham that this shortfall is addressed over the course of the plan period.	
Reg19-E-015/005	H3 Affordable housing	However, it is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan for two reasons: · firstly, the intention to alter the borough's housing targets prior to 2029 so that it is lower than the one established in the LP2021; and · secondly the proposed approach to affordable housing. Further detail on these is provided in the subsequent sections of this letter.	Comment noted. Our response to this issue is set out fully in response to the relevant representations below—relevant references: Reg19-E-015/009, Reg19-E-015/010, Reg19-E-015/011, and Reg19-E-015/012.	The Mayor now considers that the housing target proposed by the London Borough of Newham is in general conformity with the LP2021 Policy H5. However, the Mayor's position on Affordable Housing remains unchanged from the Regulation 19 response. It is his opinion that Newham's approach to affordable housing is not justified by robust evidence. A general conformity issue is maintained in relation to the proposed 60 per cent threshold for viability testing.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
Reg19-E-015/006	H1 Meeting Housing Needs	Housing LBN's housing target is set out in Table 4.1 of the LP2021 is for the delivery of 32,800 new homes between 2019 and 2029. In addition to that, LBN is also absorbing the LLDC housing target component in their area. Combined, this means that LBN's housing target is 47,600 new homes for that period, which equates to an average of 4,760 a year. For LBN's entire Plan period, 2023-2038, it is the intention to deliver up to 53,784 new homes. LBN's combined LP2021 housing target for the period 2023-2029, taking account of the shortfall in delivery prior to the start of the Plan (2019-2023) is for the delivery of just under 36,000 homes. Once that target has been met the remaining target would be to deliver almost 18,000 new homes up to 2037/38 which represents half of the current annual target. The proposed drop in housing target is considered significant. LBN's evidence in the Site Allocations	Note: The below supersedes the response set out in the 'Newham Local Plan Refresh Regulation 19 Consultation Report: Homes Comments' submitted for examination. Newham's issue with meeting our London Plan target related to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, the borough's trajectory shows we won't be able to meet our London Plan target shortfall until 2033/34. The trajectory accounts for past delivery, and carries forward into Newham's requirement any deficit arising since 2019/20. The outputs contained in the Site Allocation and Housing Trajectory Methodology Note 2025 and Newham's latest Housing Trajectory demonstrate that by the end of the Local Plan period supply, when measured cumulatively, will exceed both Newham and the LLDC's overall requirement. The results in the trajectory indicate that the projected cumulative delivery is expected to be met over the plan period. While Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local	LBN has undertaken a significant amount of work in relation to refining site capacities and establishing realistic phasing assumptions for sites included in their housing trajectory. The current difficult delivery environment has also impacted the rate of housing delivery, and the Council has set out the steps it is taking to accelerate housing delivery. When considered over the plan period as a whole, the proposed stepped housing targets and associated housing trajectory do demonstrate that LBN will (1) address the cumulative backlog from under delivery against the LP2021 target as calculated from 2019/20 and (2) once the backlog has been accounted for, make a contribution to meeting strategic London-wide strategic housing requirements following the

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		and Housing Trajectory Methodology 2024 [Footnote 1 - https://www.newham.gov.uk/downloads/file/7707/site-allocation-and-housing-trajectory-methodology-july-2024] anticipates lower than expected delivery against the LP2021 housing target which would amount to shortfall of 16,472 homes by 2029. In these situations, the Mayor considers that LBN should demonstrate that they have exhausted all suitable options for meeting the housing target by 2028/29. Where it has been clearly demonstrated that the 10-year target will not be met by 2028/29, boroughs should add the shortfall to the target identified beyond 2028/29 and LBN should clearly demonstrate how that shortfall can be delivered in the first few years after 2028/29. LBN's evidence indicates that the shortfall of delivery stems from delays to the delivery of allocated sites within the adopted Local Plan and that LBN can make up the shortfall relatively quickly by 2033/34. Instead of following the approach set	Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target related to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34. The approach to site phasing in the Submission Local Plan is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Subsequent to the submission of the plan to the Secretary of State, Newham has sought to update our housing trajectory with completions from financial year 2024/25 and update the phasing accordingly. The Planning	approach set out in LP2021 paragraph 4.1.11 (rather than seeking to rely on the national LHN figure to set targets). The first phase until 2028/2029 will maintain the LP2021 housing target. Post this, LBN have a stepped housing trajectory based on capacity. The approach taken by LBN is now in general conformity with the London Plan and aligns with paragraph 4.1.11 which sets out how boroughs should set a housing target beyond the LP2021 period. We would note that the emerging London Plan will result in a new housing target for Newham once adopted, and as such the proposed housing targets contained within the Local Plan may only be in place for a short

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		out above, the intention is to lower the borough's housing target in a stepped manner as outlined below - resulting in a target which is lower than the one currently in the LP2021 for the period to 2029 (of 4,760 homes per year up to 2029). · 2023 – 2028 - 2,974 new homes · 2028 – 2033 – 3,836 new homes · 2033 – 2038 – 3,475 new homes LBN should take into consideration that paragraph 0.0.21 of the LP2021 is clear that "The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures..."	Inspector for Newham's Local Plan has confirmed the 5-year land supply period as being 2027/28 to 2031/32. Further background information regarding the trajectory, phasing details and steps the Council has undertaken to increase speed of delivery are provided in Appendix 2 to this Statement of Common Ground, at Topic: Housing target delivery (including Beckton Riverside capacity and DLR extension, and Beckton Sewage works odour). The Council recognises the importance of ensuring the Plan is justified and effective and therefore proposes the following main modification to ensure the housing target is based on Newham's most up-to-date housing trajectory and aligned with the London Plan remaining relevant period to 2029: [Policy H1] 1. Newham will enable a net increase of between 51,425 and 53,784 45,611 and 53,954 quality residential units between 2023 2027 and 2038 2042. This will be achieved through: a. the majority of new residential units being brought forward on site allocations; and b. the optimisation of housing delivery on sites below 0.25 hectares in size; and	period of time. As previously communicated to all London boroughs, as with the current London Plan, the housing apportionment will be aligned with the spatial strategy for London as a whole and the capacity of individual planning authorities. Given the level of need identified in London of 88,000pa, borough targets are likely to be high across London.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position															
			c. supporting residential developments that come forward on windfall sites (unallocated or undesignated land) unless other policies within the Local Plan direct otherwise. Supply will be measured through a stepped trajectory, based on the lower range housing target of 45,611, with a different target for every phase of the Plan, as follows: <table><tr><th>Delivery Period</th><th>Years</th><th>Annual Delivery Target</th></tr><tr><td>Phase 1a (short term – London Plan period)</td><td>2027/28 – 2028/29</td><td>4,760</td></tr><tr><td>Phase 1b (short term)</td><td>2029/30 – 2031/32</td><td>2,542</td></tr><tr><td>Phase 2 (medium term)</td><td>2032/33 – 2036/37</td><td>2,631</td></tr><tr><td>Phase 3 (long term)</td><td>2037/38 – 2041/42</td><td>3,062</td></tr></table> [...] [Paragraph 3.174] Supply will be measured through a stepped trajectory, based on the lower range housing target of 45,611, with a different target for every five year phase of the Plan., as follows:	Delivery Period	Years	Annual Delivery Target	Phase 1a (short term – London Plan period)	2027/28 – 2028/29	4,760	Phase 1b (short term)	2029/30 – 2031/32	2,542	Phase 2 (medium term)	2032/33 – 2036/37	2,631	Phase 3 (long term)	2037/38 – 2041/42	3,062	
Delivery Period	Years	Annual Delivery Target																	
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			[H1.1] Newham will enable a net increase of between 51,425 and 53,784 53,194 and 54,976 quality residential units between 2023 and 2038. [...] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between 51,425 and 53,784 53,194 and 54,976 additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; 2,9742, 957 Medium term; 2028/29 – 2032/33; 3,8363,966 Long term; 2033/34 – 2037/38; 3,4753,716	
Reg19-E-015/007	H1 Meeting Housing Needs	Furthermore, it is important to note that the LP2021 does not meet London’s identified housing need and therefore the overall amount of housing required annually should not be expected to reduce beyond 2029. It is also noted that proposed changes to national policy are likely to mean a	Note: The below supersedes the response set out in the ‘Newham Local Plan Refresh Regulation 19 Consultation Report: Homes Comments’ submitted for examination.	The Mayor acknowledges that LBN have determined their housing targets in line with paragraph 4.1.11 of the London Plan and as such, meets the requirements of LP2021.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		significant increase in London's overall housing need figure - the Mayor is in the process of preparing a new Strategic Housing and Land Availability Assessment (SHLAA) and London Plan which will apportion targets across boroughs. Recognition of this context (of increased need) would be a useful consideration when planning for housing beyond 2029. LBN should also be aware that the recently published national draft Local Housing Need figures will not form borough new housing targets which will be different. Notwithstanding the fact that the shortfall is added to LBN's target post 2029, which is accepted in principle, the Mayor has concerns that the net target post 2029 is significantly lower at 1,980 per annum, once the shortfall is removed. In addition, the Mayor considers that the intention to lower the borough's housing target prior to 2029 to below the one set out in the LP2021 is not in general conformity with the LP2021. A failure to deliver against the LP2021 housing target compromises	We do not consider a change to the policy to be necessary, as the policy approach is in conformity with the requirements of paragraph 4.1.11 of the London Plan. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we will be able to meet our London Plan target over our plan period till 2033/34. Once we have met the London Plan housing target (in financial year 2033/34), capacity is based upon the capacity identified in the 2017 SHLAA, any additional capacity delivered as a result of any committed transport infrastructure improvements (in Newham's case informed by the largest site allocations which will continue to deliver units in the long term phase of the plan), and the rolling forward of the housing capacity assumptions applied in the London Plan for small sites. This is in accordance with the wording of paragraph 4.1.11 of the London Plan. It should also be noted that in years beyond the London Plan period housing delivery in the area of the borough formerly managed by the London Legacy Development Corporation is likely to decrease, noting that the development corporation has comprehensively considered delivery opportunities in the area, and the majority of these sites are in the process of being delivered.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		the implementation of the LP2021 as a whole.	The Council is satisfied that the approach within the plan to calculating the target once the London Plan housing target is met is sound without the proposed changes.	
Reg19-E-015/008	H1 Meeting Housing Needs	LBN should explore all the mechanisms at their disposal to facilitate all sources of housing supply including from small housing site development. LBN's small sites housing target is set out in Table 4.2 of the LP2021 to deliver 380 new homes a year. However, between 2019 and 2023 LBN's small sites delivery has averaged 284 new homes a year, which is lower than the target. LBN is advised to follow the guidance set out in Policy H2B by preparing site-specific briefs, masterplans and housing design codes for small sites. The Mayor has also published his Small Sites Design Codes LPG [Footnote 2 - https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/small-site-design-codes-lpg]. Small sites should be considered as a valuable source of housing delivery and should be capitalised to contribute	A change to this policy approach has not been made. We did not consider this change to be necessary as Newham have published a Small Sites Intensification Guidance 2024. This guidance will support the future optimisation of capacity on small sites, to ensure we meet the GLA's small sites target for Newham. The policy approach is therefore positively prepared and will be effective in development management decision-making on small sites. The Council is satisfied that the plan is sound without the proposed changes. Further background information regarding the Council's approach to maximising small site delivery is provided in Appendix 2 to this Statement of Common Ground, Topic: Housing target delivery (including Beckton Riverside capacity and DLR extension, and Beckton Sewage works odour), paragraph 1.14.	Noted, the Mayor welcomes Newham's efforts to maximise small site delivery.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		towards meeting the boroughs housing target.		
Reg19-E-015/009	H3 Affordable housing	Affordable housing The Mayor notes that the approach to affordable housing has changed since the Regulation 18 consultation. At that time, it was proposed to follow the Mayor's threshold approach at the levels set out in Policy H5 of the LP2021. The intention now is to apply the Mayor's threshold approach but to set the threshold at 60 per cent which is notably higher than the Mayor's strategic target of 50 per cent and the threshold is to be applied to all residential schemes of ten or more units. Within this, LBN's intention is to deliver 50 per cent of housing as social rented housing and 10 per cent as affordable home ownership. The proposed tenure split therefore works out as 83/17 in favour of social rent housing.	Note: The below supersedes the response set out in the 'Newham Local Plan Refresh Regulation 19 Consultation Report: Homes Comments' submitted for examination. A change to this policy approach has not been made. The target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by both our strategic housing market assessment and the fact that Newham has the highest number of residents in temporary accommodation in the country. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. The decision to change this policy approach from the Regulation 18 to Regulation 19 was a corporate decision to align with Newham's Mayor manifesto of delivering 50% of housing to be social rented, thereby increasing the threshold to 60%. While the viability assessment that supports the plan shows viability challenges in meeting this target, the testing was undertaken in a particularly challenging	The Mayor's position remains unchanged from the Regulation 19 response and it is his opinion that Newham's approach to affordable housing is not justified by robust evidence. A general conformity issues is maintained in relation to the proposed 60 per cent threshold for viability testing.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		Where residential proposals cannot meet these requirements, they will be viability tested. The thresholds set in Policy H5 of the LP2021 were informed by viability testing. For privately owned land, the 35 per cent threshold is set at a level that has proven effective at securing affordable housing. The 2022 Annual Monitoring Report [Footnote 3 - https://www.london.gov.uk/sites/default/files/2024-05/AMR19%202021_22%20%28final%29%20%281%29.pdf] illustrates that 84 per cent of all strategic applications provided at least 35 per cent affordable housing, representing an increase from 53 per cent of schemes in 2018. The average rate of affordable homes per scheme was 41 per cent of all units and 45 per cent of all habitable rooms. While the delivery of affordable housing in London is a key priority for the Mayor, we are very concerned that setting the threshold at 60 per cent	viability context, with construction costs and interest rates being abnormally high. We consider that as economic circumstances improve, the policy will become easier to deliver over the plan period. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the policy target, thereby ensuring the plan remains effective and deliverable. Further background information regarding Council's approach to meeting its need for affordable, and primarily social housing, and the reasons why the viability tested route is considered appropriate for Newham is provided in Appendix 2 to this Statement of Common Ground, at Topic: Affordable housing approach. It is useful to note that the Council has requested in the submission letter, that the Inspector recommends any main modifications required, in order to make the Plan sound.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		would actually reduce the delivery of affordable homes in practice and would result in larger numbers of residential planning applications not being able to meet the threshold. Indeed, the Local Plan Viability Report [Footnote 4 - file:///C:/Users/hassa/Documents/Work%20%20Related/Newham/Reg%2019/evidence/Newham_Local_Plan_Reg_19_viability_report.pdf], published as part of the evidence base, does not demonstrate that most sites or typologies tested would be deliverable with a 60 per cent affordable housing requirement. This would mean more proposals following the Viability Tested Route (VTR), which undermines the threshold approach, takes longer to determine planning applications when compared with Fast Track Route (FTR) schemes, and overall, provides less affordable housing. To illustrate this point, on average, schemes that were referable to the Mayor that followed the FTR		

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		provided 44 per cent affordable housing in 2022, whereas viability tested schemes provided only 28 per cent. The approach would also result in a lack of certainty when acquiring land due to the lack of consistency in affordable housing provision from site to site. Furthermore, applicants also typically seek to demonstrate the existence of 'viability deficits' through the viability assessment process and use these as a credit in viability review mechanisms which can reduce the likelihood that additional affordable housing is secured over the lifetime of the development. As such there is a significant risk that the borough would secure fewer affordable homes through the proposed blanket 60 per cent requirement than could be achieved through the 35 per cent and 50 per cent thresholds set out in the LP2021.		
Reg19-E-015/010	H3 Affordable housing	We note that Policy H3 refers to review mechanisms set out in Policy BFN4, but these have not been set out in the draft	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach is effective. Policy BFN4.2 sets out the need to explore all available options (including	Noted.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		Plan and their inclusion would be beneficial and useful.	review mechanisms, flexible trigger points or phased payment of contributions) to reduce the viability gap and secure much needed contributions. The policy's Evidence base list also refers to the Affordable Housing and Viability Supplementary Planning Guidance, which provides further guidance on formulating review mechanisms. The Council is satisfied that the plan remains sound without the proposed changes.	
Reg19-E-015/011	H3 Affordable housing	The proposed tenure split also diverges from LP2021 Policy H6 which makes it clear that the tenure requirement for affordable housing should be 30 per cent each for low cost rent and intermediate housing products and the remaining 40 per cent should be determined by boroughs. LBN's proposed approach does not meet these requirements by requiring an 83/17 split in favour of social rented housing. Again, this is likely to mean that relatively few residential applications will be able to meet these requirements resulting in even more schemes having to take the Viability Tested Route.	Note: The below supersedes the response set out in the 'Newham Local Plan Refresh Regulation 19 Consultation Report: Homes Comments' submitted for examination. The decision to change this policy approach from the Regulation 18 to Regulation 19 was a corporate decision to align with Newham's Mayor manifesto of delivering 50% of housing for social rented, given the fact that Newham has the highest number of residents in temporary accommodation in the country. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability challenges in meeting this target, the testing was undertaken in a particularly challenging viability context, with construction costs and interest rates being abnormally high. We consider that as economic	While the Mayor is very supportive of social rent housing and accepts that Newham has evidenced a need for a higher level of social housing, he remains concerned that the viability evidence does not support the proposed tenure split as a policy to be applied across all sites.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			circumstances improve, the policy will become easier to deliver over the plan period. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the policy target, thereby ensuring the plan remains effective and deliverable. Further background information regarding Council's approach to securing a tenure split reflective of Newham's needs is provided in Appendix 2 to this Statement of Common Ground, at Topic: Affordable housing approach. It is useful to note that the Council has requested in the submission letter, that the Inspector recommends any main modifications required, in order to make the Plan sound.	
Reg19-E-015/012	H4 Housing mix	There are also additional pressures / risks to the threshold approach and the delivery of affordable housing with the proposal that 40 per cent of all new homes are to be family homes containing 3 or more bedrooms.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, which includes a need for larger family-homes and the substantial need for both market and affordable three bed homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met,	While the Mayor acknowledges Newham's local housing need, there is concern that the viability evidence does not support Newham's proposed 40 percent requirement for family homes as a policy to be applied across all sites.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.	
Reg19-E-015/013	H3 Affordable housing	Overall, this divergence from the approach set out in LP2021 Policy H5 and Policy H6 is significant and for that reason it is the Mayor's opinion that the proposed approach to affordable housing is not in general conformity with the LP2021.	Comment noted. Our response to this issue is set out fully in response to the relevant representations above – relevant references: Reg19-E-015/009, Reg19-E-015/010, Reg19-E-015/011, and Reg19-E-015/012.	The Mayor's position remains unchanged from the Regulation 19 response and it is his opinion that Newham's approach to affordable housing is not justified by robust evidence. A general conformity issue is therefore maintained in relation to the proposed 60 per cent threshold for viability testing.
Reg19-E-015/014	H10 Gypsy and Traveller Accommodation	Gypsy and Traveller accommodation Policy H10 of the draft Plan safeguards an existing Gypsy and Traveller site in the borough and sets out broad criteria for new sites. To be consistent with LP2021 Policy H14, LBN should set out the borough's ten year pitch requirements and plan to meet those needs. The Mayor is finalising work on the London-wide Gypsy and Traveller	The Gypsy and Traveller Topic Paper highlights the deliverability challenges of providing new sites for pitches in the borough, particularly given the significant areas of available land in the borough being in flood zones. The Council had followed due process in trying to identify land to meet this specialist need and while we have identified an available extension to the existing Gypsy and Traveller site in the borough, which can accommodate two pitches, we are not able to fully meet the need for 23	The Mayor acknowledges that LBN is undertaking further work to identify additional land to meet this identified need, and that an extension to the existing Gypsy and Traveller site in the borough will accommodate at least two additional pitches. Subject to the completion of this work and proposed modifications to include a ten year pitch target,

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		Accommodation Needs Assessment. Until complete, LBN should rely on its latest evidence which indicates a need for 23 pitches. It should be made clear whether the existing Gypsy and Traveller site has capacity to meet identified need over the Plan period. If not, LBN will need to plan to meet this.	pitches identified in our Gypsy and Traveller Accommodation Assessment. Our position is more fully set out in the H10: Gypsy and Traveller Accommodation Topic Paper that accompanies the Local Plan submission. In summary: • We undertook a Call for Sites in 2021, allowing individuals and organisations the opportunity to let the Council know about land or buildings in the borough that could be redeveloped between now and 2038. In response to the Call for Sites, no sites were submitted for Gypsy and Traveller pitch delivery. • After the 2023 Planning Policy for Traveller Sites update, Newham further reviewed our identified site allocations in the Draft Local Plan to see whether any would be suitable, available or achievable for pitch delivery. However, none were identified as suitable for Gypsy and Traveller pitch delivery, noting flood risk and land availability issues. • We have engaged in dialogue with all neighbouring boroughs around whether they have capacity to meet our unmet need for Gypsy and Traveller accommodation. No boroughs were able to assist Newham with meeting our housing need for pitch provision.	indicative capacity at allocated site(s), support delivery of windfall sites, and updates to relevant supporting paragraphs, the Mayor's concerns regarding this policy would be resolved. The commitment to monitoring the number of pitches required is also welcomed.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			The Council consider that given the significance of the challenges face in a London context, this specialist need should be address strategically through the London Plan and supporting evidence. In addition, the London Plan will be the best place to address London wide deficit as part of the duty to corporate. Currently we have identified two pitches to meet our need and we are currently in the process of undertaking an asset review of small sites within the Council's ownership. This includes considering whether sites are suitable to deliver permanent or transit pitches which can help meet some of our identified need. Further background information in relation to the steps Newham has undertaken to address this need is provided in Appendix 2 to this Statement of Common Ground, at Topic: Gypsy and Traveller need. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the lack of a specific monitoring indicator on the number of pitches the Council needs to deliver. In light of these comments, the Council recognises the importance of ensuring the Plan is justified and therefore	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position										
			proposes the following modification to policy H10 Gypsy and Traveller accommodation 1. The Council will seek to meet the housing needs of Gypsy and Traveller communities over the plan period. This includes setting a ten year target to deliver 19 pitches. 2. The designated Gypsy and Traveller site is safeguarded as a site for Gypsy and Traveller Accommodation. The enhancement and where feasible intensification and/or expansion of the site will be supported to contribute to meeting the ten year pitch target. Modification is also proposed to H10 Gypsy and Traveller accommodation Justification text para 3.195 to include the table below. <table> <tr> <th></th><th>Phase 1 (Short term) 27/28 - 31/32</th><th>Phase 2 (Medium term) 32/33 - 36/37</th><th>Phase 3 (Long term) 37/38 - 41/42</th><th>Total</th></tr> <tr> <td>Total need for each phase</td><td>17 pitches</td><td>2 pitches</td><td>4 pitches</td><td>23 pitches</td></tr> </table>		Phase 1 (Short term) 27/28 - 31/32	Phase 2 (Medium term) 32/33 - 36/37	Phase 3 (Long term) 37/38 - 41/42	Total	Total need for each phase	17 pitches	2 pitches	4 pitches	23 pitches	
	Phase 1 (Short term) 27/28 - 31/32	Phase 2 (Medium term) 32/33 - 36/37	Phase 3 (Long term) 37/38 - 41/42	Total										
Total need for each phase	17 pitches	2 pitches	4 pitches	23 pitches										

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			3.195 The Planning Policy for Traveller Sites requires Local Planning Authorities to identify sufficient sites to meet any need identified for Gypsies and Travellers across their plan period. Newham's latest evidence of Gypsy and Traveller accommodation needs found a need for: 23 pitches in the borough Minor modification is also proposed to the Monitoring Framework under key performance indicator 33: Delivery of Gypsy and Traveller accommodation to remove the wording No target and to include. Ten year target of 19 pitches. Monitor proportionately compared to need identified in the Gypsy and Traveller Accommodation Assessment and any emerging evidence prepared by the Greater London Authority.	
Reg19-E-015/015 a	Inclusive Economy	Industrial capacity Throughout the draft Plan there are many instances where the generic term 'employment uses' is used. This term blurs the necessary distinction between industrial, office and other commercial activities and their respective Use Classes. The draft Plan should be	A change to this policy approach has not been made. We did not consider this change to be necessary as the term 'employment uses' is clearly defined in the Glossary section, which outlines the relevant use classes. 'Employment uses' in this Plan refers only to industrial and office floorspace, and their distinctions clearly set out in both demand analysis and delivery requirements within the Inclusive Economy Policies, as well as in the site	Noted and accepted.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		amended accordingly so that the distinction is recognised, [with priority given to those vital uses which the borough can control / support which fall outside Use Class E.]	allocations identified for delivering employment floorspace. The Council is satisfied that the plan remains sound without the proposed changes.	
Reg19-E-015/015 b	Inclusive Economy	[Industrial capacity] Throughout the draft Plan there are many instances where the generic term 'employment uses' is used. This term blurs the necessary distinction between industrial, office and other commercial activities and their respective Use Classes. The draft Plan should be amended accordingly so that the distinction is recognised,] with priority given to those vital uses which the borough can control / support which fall outside Use Class E.	The Council's objective for this policy approach is to ensure sufficient supply of industrial capacity in Newham while maintaining flexibility in land use classification in employment sites and site allocations. The aggregated categorisation of Class B and Class E(g) industrial floorspace is effective in addressing Newham's needs, as the industrial premises in the borough accommodate a wide variety of industrial occupier profiles, as informed by the Employment Land Review 2022. This is primarily because the light industrial floorspace which accommodate activities that are genuinely light enough to be undertaken in a residential environment overlaps with office spaces, while the vast majority of the existing light industrial units are still located in established industrial estates due to operational requirements such as the storage and servicing of light goods vehicles. There is no clear evidence that these existing floorspace can be relocated outside designated industrial locations to serve the occupier's operational needs. This finding is supported by additional work undertaken by the Council to review	Noted and accepted. However, the Mayor still has a preference for SIL capacity to be prioritised for B use class.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			Class E industrial floorspace completions in the borough, attached to the statement of common ground as Appendix 3, which reiterates the findings of the aggregated methodology in the Employment Land Review (2022). We considered the current approach is in conformity with the London Plan. London Plan Policies E4 - E7 set out the range of industrial uses acceptable in Strategic Industrial Locations, Locally Significant Industrial Sites (equivalent to Local Industrial Locations in this Plan) and non-designated industrial sites. This includes Class B uses, as well as research and development floorspace (Class E(g)(ii)/B1b) and light industrial floorspace (Class E(g)(iii)/B1c), with no prioritisation over particular use classes in relevant policies. In other words, the London Plan actively encourages Class E industrial floorspace within protected employment land in the same way as it does for Class B floorspace. As set out in Local Plan Policy J1, Class E(g) industrial floorspace is directed to both non-designated and designated employment sites including SILs and LILs, and all proposals within SILs or LILs for office E(g)(i) floorspace is required to be ancillary to the industrial function. As such, our approach is considered in line with the approach in the London Plan to promote industrial supply.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			Further analysis has identified that the scale of E(g)(iii) class activity in Newham is insignificant compared to the overall industrial market. Data including the GLA Industrial Land Supply Study 2023, the Council's completion data and a view derived from Standard Industrial Classification (SIC) have been analysed, concluding that the share of light industrial activity in Newham is around 15% of the overall industrial demand. Taking into account the insignificant share of the light industrial market in Newham and the low likelihood of current occupiers relocating from industrial estates, as discussed above, it is concluded that the loss of Class E space through Use Class MA permitted development rights will not have a detrimental impact on the overall industrial supply in the borough. Nevertheless, floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Use Class MA permitted development right can be controlled and monitored. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes: J1.2 Implementation: All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location. J3 Implementation (All): Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			consented within Class E, under the following circumstances: - the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified. Monitoring Framework - Key performance indicator 22: Target no net loss of floorspace. Monitor for location against designated employment land and non-designated employment sites. Monitor approvals (gains and loss) and completions. Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site allocations and other non-designated employment sites.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			which are included in the minor modification table.	
Reg19-E-015/016	J1 Employment and growth	Policy J1 establishes a strategic need to deliver 335,000sqm of industrial floorspace up to 2038. This clarity is welcomed and would enable LBN to broadly plan to meet their industrial needs. However, within this LBN should establish how much is for Class B uses and then focus on protecting them and promoting their intensification in terms of floorspace capacity.	The Council's objective for this policy approach is to ensure sufficient supply of industrial capacity in Newham while maintaining flexibility in land use classification in employment sites and site allocations. The aggregated categorisation of Class B and Class E(g) industrial floorspace is effective in addressing Newham's needs, as the industrial premises in the borough accommodate a wide variety of industrial occupier profiles, as informed by the Employment Land Review 2022. This is primarily because the light industrial floorspace which accommodate activities that are genuinely light enough to be undertaken in a residential environment overlaps with office spaces, while the vast majority of the existing light industrial units are still located in established industrial estates due to operational requirements such as the storage and servicing of light goods vehicles. There is no clear evidence that these existing floorspace can be relocated outside designated industrial locations to serve the occupier's operational needs. This finding is supported by additional work undertaken by the Council to review Class E industrial floorspace completions in the borough, attached to this statement of common ground as Appendix 3, which reiterates the findings of the aggregated	The Mayor welcomes the inclusion of a commitment to monitor class B uses and considers that Newham are adequately planning for industrial land across the borough.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			methodology in the Employment Land Review (2022). We considered the current approach is in conformity with the London Plan. London Plan Policies E4 - E7 set out the range of industrial uses acceptable in Strategic Industrial Locations, Locally Significant Industrial Sites (equivalent to Local Industrial Locations in this Plan) and non-designated industrial sites. This includes Class B uses, as well as research and development floorspace (Class E(g)(ii)/B1b) and light industrial floorspace (Class E(g)(iii)/B1c), with no prioritisation over particular use classes in relevant policies. In other words, the London Plan actively encourages Class E industrial floorspace within protected employment land in the same way as it does for Class B floorspace. As set out in Local Plan Policy J1, Class E(g) industrial floorspace is directed to both non-designated and designated employment sites including SILs and LILs, and all proposals within SILs or LILs for office E(g)(i) floorspace is required to be ancillary to the industrial function. As such, our approach is considered in line with the approach in the London Plan to promote industrial supply. Further analysis has identified that the scale of E(g)(iii) class activity in Newham is insignificant compared to the overall industrial market. Data including the GLA Industrial	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			Land Supply Study 2023, the Council's completion data and a view derived from Standard Industrial Classification (SIC) have been analysed, concluding that the share of light industrial activity in Newham is around 15% of the overall industrial demand. Taking into account the insignificant share of the light industrial market in Newham and the low likelihood of current occupiers relocating from industrial estates, as discussed above, it is concluded that the loss of Class E space through Use Class MA permitted development rights will not have a detrimental impact on the overall industrial supply in the borough. Nevertheless, floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Use Class MA permitted development right can be controlled and monitored. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes:	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			J1.2 Implementation: All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location. J3 Implementation (All): Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances: - the floorspace to be relocated or replaced is within a SIL or LIL; or	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			- the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified. Monitoring Framework - Key performance indicator 22: Target no net loss of floorspace. Monitor for location against designated employment land and non-designated employment sites. Monitor approvals (gains and loss) and completions. Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site allocations and other non-designated employment sites. which are included in the minor modification table.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
Reg19-E-015/017	J2 New employment floorspace	While Policy J2 broadly expects all developments in Strategic Industrial Locations (SIL) and Local Industrial Land (LIL) (equivalent to the LP2021's Locally Significant Industrial Land designation) to intensify industrial site use to deliver net increases in industrial floorspace - which is welcomed - it is clear in the evidence [Footnote 5 - https://www.newham.gov.uk/downloads/file/4966/lb-newham-employment-land-review-july-2022-] that some sites have been identified which have greater potential for industrial intensification over others. These sites would benefit from being identified in the draft Plan and being supported either through masterplanning or through allocations. The evidence suggests a latent capacity to deliver increases in industrial capacity amounting to approximately 352,000sqm. The intention should be to take a more proactive approach towards meeting the borough's industrial need.	The Council's objective for this policy approach is to optimise the industrial capacity in Newham to meet the borough's strong industrial needs as informed by the Employment Land Review 2022 through promoting no net loss of industrial capacity and delivering industrial intensification in all designated employment locations. The Council is already using a proactive approach on intensification, including the change to the policy approach at Regulation 18 stage to introduce tall building zones in Strategic Industrial Locations to accommodate stacked industrial uses. In particular, in relation to the sites identified under the Employment Land Review 2022 as having potential for intensification within the plan period, the Council is working proactively with stakeholders to consider how the intensification can be best delivered at its optimal capacity. A Council-led regeneration framework for Canning Town Industrial Area (which consists of council-owned assets) is being developed. Grantham Road is subject to planning permission for industrial intensification while Bow Goods Yard is currently subject to a live application. The Council also notes positive feedback from developers during Regulation 18 and Regulation 19 consultations on the intensification approach on a number of sites. Most of these sites are anticipated to be delivered from the	The Mayor welcomes LBNs efforts to promote the intensification of industrial sites in line with Policy E7 of the London Plan.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			medium term to end of the plan period. As there is still a high degree of uncertainty and risk in respect of the intensification sites, it is considered necessary that the Council should promote intensification of all designated employment locations to proactively meet the identified industrial needs in the borough. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes: Table 12 Footnote for 'Sites with potential for intensification': Including the 10 Strategic Industrial Locations/ Local Industrial Locations with potential for intensification in the plan period identified in Table 4.5 of the Employment Land Review (2022). Policy J1.2 implementation text: To meet the industrial demand and enable employment growth, industrial development in both SILs and LILs have to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. Where Strategic Industrial Locations and Local Industrial	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			Locations have been identified as sites with potential for intensification in the plan period under Table 4.5 of the Employment Land Review (2022), the Council will work proactively with site owners and industrial occupiers to explore the opportunities for optimisation of industrial capacity at these sites where appropriate. It is also acknowledged that some of these sites are owned by the Council, which provides additional opportunities for proactive planning for industrial intensification to achieve the objective of this policy. which are included in the minor modification table.	
Reg19-E-015/018	Inclusive Economy	The draft Plan should also include a clear intention to thoroughly monitor industrial capacity over the life of the Plan to be consistent with the approach in Policy E4C of the LP2021. This should include a focus on monitoring Class B uses to ensure this type of capacity is increased to meet established identified need. Monitoring should be set against the evidence of potential capacities established in the evidence for specific industrial sites.	The Council's objective for this policy approach is to ensure sufficient supply of industrial capacity in Newham while maintaining flexibility in land use classification in employment sites and site allocations. The aggregated categorisation of Class B and Class E(g) industrial floorspace is effective in addressing Newham's needs, as the industrial premises in the borough accommodate a wide variety of industrial occupier profiles, as informed by the Employment Land Review 2022. This is primarily because the light industrial floorspace which accommodate activities that are genuinely light enough to be undertaken in a residential environment overlaps with office spaces, while the vast majority of the	The Mayor welcomes the inclusion of a commitment to monitor Class B uses within the Borough.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			existing light industrial units are still located in established industrial estates due to operational requirements such as the storage and servicing of light goods vehicles. There is no clear evidence that these existing floorspace can be relocated outside designated industrial locations to serve the occupier's operational needs. This finding is supported by additional work undertaken by the Council to review Class E industrial floorspace completions in the borough, which reiterates the findings of the aggregated methodology in the Employment Land Review (2022). We considered the current approach is in conformity with the London Plan. London Plan Policies E4 - E7 set out the range of industrial uses acceptable in Strategic Industrial Locations, Locally Significant Industrial Sites (equivalent to Local Industrial Locations in this Plan) and non-designated industrial sites. This includes Class B uses, as well as research and development floorspace (Class E(g)(ii)/B1b) and light industrial floorspace (Class E(g)(iii)/B1c), with no prioritisation over particular use classes in relevant policies. In other words, the London Plan actively encourages Class E industrial floorspace within protected employment land in the same way as it does for Class B floorspace. As set out in Local Plan Policy J1, Class E(g) industrial floorspace is directed to both non-designated and designated employment sites including SILs and LILs,	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			and all proposals within SILs or LILs for office E(g)(i) floorspace is required to be ancillary to the industrial function. As such, our approach is considered in line with the approach in the London Plan to promote industrial supply. Further analysis, see Appendix 3, has identified that the scale of E(g)(iii) class activity in Newham is insignificant compared to the overall industrial market. Data including the GLA Industrial Land Supply Study 2023, the Council's completion data and a view derived from Standard Industrial Classification (SIC) have been analysed, concluding that the share of light industrial activity in Newham is around 15% of the overall industrial demand. Taking into account the insignificant share of the light industrial market in Newham and the low likelihood of current occupiers relocating from industrial estates, as discussed above, it is concluded that the loss of Class E space through Use Class MA permitted development rights will not have a detrimental impact on the overall industrial supply in the borough. Nevertheless, floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Use Class MA permitted development right can be controlled and monitored. In	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes: J1.2 Implementation: All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			J3 Implementation (All): Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances: - the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified. Monitoring Framework - Key performance indicator 22: Target no net loss of floorspace. Monitor for location against designated employment land and non-designated employment sites. Monitor approvals (gains and loss) and completions. Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site allocations and other non-designated employment sites. which are included in the minor modification table.	
Reg19-E-015/019	Inclusive Economy	The draft Plan proposes to reconfigure some of its designated industrial land. The most significant of which is the proposed intention to release the southern part of the British Gas / Cody Road SIL. However, this will be offset by the proposed designation of new SIL on an adjacent site at Bidder Street. The reconfiguration would result in a net gain of 0.26ha of SIL. For this reason, the proposed reconfiguration appears to be acceptable but should focus on accommodating Class B uses.	We welcome your support for our broad approach to the land swap proposal. The British Gas/ Cody Road SIL, along with the land swap site within the proposed SIL boundary, will be prioritised for large scale industrial uses as outlined in Table 6 in Policy J1 to address the borough's industrial capacity needs as identified in the Employment Land Review 2022. These will be primarily delivered within Cass B floorspace. Any proposals incorporating employment floorspace that deviate from the priority uses in Policy J1 will need to be sufficiently justified by evidence of market demand at this location. We do not consider any change are required to focus on accommodating B uses at this location as we consider our policy approach to be positively prepared, justified and effective to ensure sufficient supply of industrial capacity in Newham while maintaining flexibility in land use	Noted.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			classification in Strategic Industrial Locations. In addition to the priority uses table, our employment policies direct both Class B and Class E(g) industrial floorspace to Strategic Industrial Locations, which is effective in addressing Newham's needs, as the industrial premises in the borough accommodate a wide variety of industrial occupier profiles, as informed by the Employment Land Review 2022. Further analysis, see Appendix 3, shows that the vast majority of light industrial spaces in Newham are located within established industrial estates and there is no evidence that they can be relocated elsewhere due to their operational needs. In addition, the scale of E(g)(iii) class activity in Newham is shown to be insignificant compared to the overall industrial market. Nevertheless, floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Use Class MA permitted development right can be controlled and monitored through using planning conditions in the development management process. The current approach is in conformity with the London Plan. London Plan Policies E4 and E5 set out the range of industrial uses acceptable in Strategic Industrial Locations, which includes Class B uses but also research and development floorspace (Class E(g)(ii)/B1b) and light	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			industrial floorspace (Class E(g)(iii)/B1c) with no prioritisation over particular use classes. The Council is satisfied that the plan remains sound without the proposed changes.	
Reg19-E-015/020	Inclusive Economy	LBN intend to release Sugar House Lane / Stratford High Street LSIS from its industrial designation through the draft Plan and this should be made clearer. If there is existing Use Class B capacity within the area this should be monitored and reprovided or maintained.	A change to this policy approach has not been made. We did not consider this change to be necessary as it is clear in the site allocation wording that the employment uses should meet requirements as set out in Local Plan Policy J1 and should deliver the same quantity of employment uses as the permitted scheme. The approach to employment floorspace within the permitted proposal was broadly supported by the GLA as outlined in the GLA Stage II Report. Existing industrial capacity at the site is protected by Local Plan Policy J3 which requires site allocations to reprovide employment floorspace for existing businesses or submit a Relocation Strategy demonstrating reasonable endeavours to relocate existing businesses. The Council is satisfied that the plan remains sound without the proposed changes.	The Mayor is satisfied that this approach aligns with the London Plan's industrial policies.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
Reg19-E-015/021	D4 Tall buildings	Tall buildings The draft Plan's proposed definition of a tall building meets the requirements of Policy D9A and sets it at 21m.	Supported noted.	Noted.
Reg19-E-015/022	D4 Tall buildings	The draft Plan also meets the requirements of Policy D9B. LBN should note that Policy D9 specifically uses the term 'appropriate building heights'. This implies some flexibility which could include a range of 'appropriate building heights'. This is considered to be practical in terms of enabling boroughs to focus the tallest buildings in a particular more central part of a tall building zone and perhaps seeking lower building heights towards the edges of that zone, if that is indeed what the borough wishes to do. Maximum building heights could be helpful in situations where an absolute is required and necessary. For instance, to prevent the development of tall buildings from obstructing one of London's strategic views, as set out in the London View Management Framework (LVMF), or where maximum building heights have been set by the	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan policy D9, which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states "in these locations, determine the maximum height that could be acceptable". The Council also considers that the methodology used to identify suitable locations and height for tall buildings, included in Newham Characterisation Study (2024) and Tall Building Annex (2024), complies with the Characterisation and Growth Strategy LPG. In relation to your suggestion for using indicative heights in order to enable varying building heights within a tall building zone, the Council considers that the proposed tall building strategy already addresses it. The range of building heights, illustrated in the policy map and in Table 1, has already taken into considerations the practical arrangements of taller and lower buildings within each Tall Building Zone. The proposed varying heights	Policy D9 uses the term "appropriate building heights". Whilst the term "maximum height" is referenced in supporting text, policy takes precedence. As such, it remains the Mayor's preference that the wording be changed to reflect this.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		Civil Aviation Authority. Where the draft Plan uses the term 'maximum' building heights the term 'appropriate' building heights should be used instead, in accordance with the advice set out above.	within the tall buildings zone allow for transitioning heights from the tallest element to the surrounding context and sensitive areas, whether low-rise context or historic asset. Therefore, we consider that defining maximum heights, which are supported by a comprehensive evidence base and an evaluation that already addresses design-led approach and optimisation considerations, meets the requirements of the London Plan and helps manage tall building developments at pre-application stage, giving a clear direction of expectation. Further background information regarding Newham's approach to applying London Plan Policy D9 in its policy and evidence base development is provided in Appendix 2 to this Statement of Common Ground, at Topic: Tall buildings strategy and protected vistas. The Council is satisfied that the plan remains sound without the proposed changes.	
Reg19-E-015/023	D4 Tall buildings	There are two strategic LVMF views that intersect with the borough, these should be included in the borough's Policies Map and within the draft Plan to provide clarity.	The Council acknowledges there are two strategic LVMF views that intersect with the borough. The Richmond to St Pauls 9A.1 protected vista is already referenced in the TBZ19: Stratford Central and TBZ20: Chobham Manor / East Village, and implementation text D4.3 adequately addresses the need to consider any visual impact on any of the LVMF views. There are no Tall Building Zones or site allocations within the background of the linear view 8A.1	Noted and welcomed.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			Westminster Pier to St. Paul's Cathedral. Therefore, we don't consider it necessary to specifically reference the linear vista 8A.1 in the Tall Building Policy. However, the Council recognises the importance of ensuring the Plan is accurate and has therefore made the following change: [Westminster Pier to St Paul's Cathedral 8A.1 and Richmond to St Pauls 9A.1 protected vistas will be added in the Policies Map for clarity] which is included in the minor modification table.	
Reg19-E-015/024	CE6 Air quality	Air quality LBN has five air quality focus areas, which are set out in Figure 9.1 of the LP2021. This should be made clear in draft Policy CE6. Development proposals in these areas should demonstrate that design measures have been used to minimise exposure to poor air quality [...]	Comment noted. As set out in Policy CE6, the Council considers that the entire borough has poor air quality, with the whole borough designated an Air Quality Management Area in 2018. Policy CE6 sets out specific design interventions and considerations for development to minimise exposure to poor air quality.	Noted, no further comments.
Reg19-E-015/025	Neighbour hoods	Air quality [LBN has five air quality focus areas, which are set out in Figure 9.1 of the LP2021. This should be made clear in draft Policy CE6. Development proposals in these areas should demonstrate that design measures have been used to minimise exposure to	Comment noted. The Council considers Policy CE6 sets out specific design interventions and considerations for development to minimise exposure to poor air quality.	Noted, no further comments.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		poor air quality] and this should be reflected in relevant site allocations.		
Reg19-E-015/026	BFN4 Developer contributions and infrastructure delivery	Viability Policy BFN4 sets out the borough's proposed priorities in situations where developments are unable to meet all policy requirements. Part 3 of the policy sets out the borough's priorities in the following order - affordable and family housing, local access to employment and training and the delivery of required infrastructure. The approach is not aligned with the approach set out in Policy DF1 part D of the LP2021, which makes it clear that in such situations priority should firstly be given to affordable housing and necessary public transport improvements. The policy should be amended accordingly so that it is aligned with Policy DF1 of the LP2021.	The Newham Local Plan approach to securing planning obligations is to provide the overarching approach through policy BFN4, with any further planning obligations required to deliver specific policies listed under the relevant policy (e.g. T1 for transport infrastructure). Additionally, site-specific clarity is provided through the site allocations' infrastructure requirements, which require the delivery of all types of infrastructure that have already been identified through the evidence base (e.g. the Sustainable Transport Strategy) and are relevant to the site. Policy BFN4 of Newham's Submission Draft Local Plan sets out the borough's priorities with regards to securing developer contributions for infrastructure, and states that: <i>Newham's policy priority is the provision of more social rent homes due to the needs of Newham residents for genuinely affordable, long-term, secure, rented accommodation. Where necessary to deliver the provision of infrastructure required as part of a site allocation, or where its provision is considered necessary by internal, regional or national consultees or partner bodies, an alternative prioritisation may be considered more appropriate and/or additional sources of funding to enable the delivery of the required infrastructure may, where</i>	The Mayor of London does not consider that the flexibilities provided by policy BFN4 implementation text are sufficient to ensure consistency with the London Plan, and recommend that more specific changes as suggested in Regulation 19 response are made to the policy to prioritise funding of transport infrastructure to align with London Plan policy DF1.D

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			<i>possible, be identified by the Council. The Council will also support the exploration of additional sources of funding to enable the delivery of the required infrastructure.</i> This prioritisation approach is also in Newham's adopted Local Plan (2018) and Newham do not consider there to be any examples where required transport infrastructure has not been delivered as a result of the existing policy. The flexibility for site-specific context to lead to changes in the prioritisation of contributions is reiterated in policy BFN4, and could be used where a piece of transport infrastructure is required for a site to come forward.	
Reg19-E-015/027	Transport	Transport The Mayor welcomes the continued support for public transport and active travel improvements, including the potential DLR extension	Support noted.	The Mayor's position remains unchanged.
Reg19-E-015/028	Transport	Transport The Mayor welcomes the continued support for public transport and active travel improvements, including [the potential DLR extension] and potential major project at Stratford station.	Support noted.	The Mayor's position remains unchanged.
Reg19-E-015/029	Transport	Also welcomed is the commitment to a network of well-connected neighbourhoods across the borough	Support noted.	The Mayor's position remains unchanged.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
Reg19-E-015/030	Transport	Also welcomed is the commitment to [a network of well-connected neighbourhoods across the borough], implementation of Low Traffic Neighbourhoods and School Streets	Support noted.	The Mayor's position remains unchanged.
Reg19-E-015/031	Transport	Also welcomed is the commitment to [a network of well-connected neighbourhoods across the borough, implementation of Low Traffic Neighbourhoods and School Streets], and adoption of the Healthy Streets Approach.	Support noted.	The Mayor's position remains unchanged.
Reg19-E-015/032	Transport	The requirement for all development to be car free is strongly supported	Support noted.	The Mayor's position remains unchanged.
Reg19-E-015/033	Transport	[The requirement for all development to be car free is strongly supported] and the addition of references to locally specific mode share targets [and the Mayor's Vision Zero road safety objective] is noted and welcomed too.	Support noted.	The Mayor's position remains unchanged.
Reg19-E-015/034	Transport	[The requirement for all development to be car free is strongly supported and the addition of references to locally specific mode share targets] and the Mayor's Vision Zero road safety objective is noted and welcomed too.	Support noted.	The Mayor's position remains unchanged.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
Reg19-E-015/035	Neighbour hoods	Site allocations The site allocations do not set out capacity assumptions, so it is not possible to understand if the draft Plan is able to meet its housing target between 2019 and 2029. In addition, it means that stakeholders cannot review proposed capacity assumptions and comment on them easily. Capacity figures provide the basis from which the borough can monitor site development progress against strategic figures for growth including those for housing. It should also be noted that this is a requirement of LP2021 Policy D1B. As the draft Plan has projected a significant shortfall in the ability to deliver housing, capacity assumptions for the site allocations should be considered critical in setting the minimum housing requirements and other growth over the Plan period.	Note: The below supersedes the response set out in the ‘Newham Local Plan Refresh Regulation 19 Consultation Report: Homes Comments’ submitted for examination. A change to this policy approach has not been made. We did not consider this change to be necessary as the approach is justified. The site allocations include design principles for how sites should be optimised for housing as well as requirements for different types of use. The capacities of the site allocations have been previously shared with the GLA and the Council are willing to share these again if needed. Upon review of LP2021 Policy D1B, there is a requirement to undertake the capacity assessments for sites but there is no requirement to publish the capacity figures so the Council is satisfied that the plan is sound without the proposed changes. Further background information regarding Newham’s application of London Plan policy D1B and developing Newham’s capacity assessment was provided to the Inspector as part of our response to his preliminary questions, this has been published on our examination webpage as: • ED003a- Topic Paper - Site Capacity Study Summary - Part 1 (PDF) • ED003b- Topic Paper - Site Capacity Study Summary - Part 2 (PDF)	The Mayor notes that additional information has been published by Newham regarding site capacities. While this is not an issue of general conformity, the Mayor disagrees with Newham’s approach to not publishing individual site capacities within the Local Plan.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
Reg19-E-015/036	N2.SA1 Silvertown Quays	Site/s: N2.SA1 – Land at Silvertown Quays, North Woolwich Road. Comments: There is an existing safeguarded waste site within this allocation. The intention should be to protect and maintain the waste capacity of the facility until at least the current review of the East London Waste Plan is completed. The Mayor notes the intention to promote and prioritise industrial floorspace including for warehousing and distribution uses.	A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation requirements are justified. The waste sites referred to in this comment are subject to a longstanding extant planning permission 14/01605/OUT, which will result in the redevelopment of the waste uses. The Council is satisfied that the plan remains sound without the proposed changes.	The site is subject to an extant consent which appears to have been implemented. If LBN can confirm this, The Mayor would not object to the LBNs position.
Reg19-E-015/037	N2.SA2 Lyle Park West	Site/s: N2.SA2 – Land at Knights Road and Bradfield Road. Comments: The site contains waste sites and non-designated industrial sites. The Mayor notes that the intention is to prioritise industrial floorspace for warehousing and light industry. However, the focus should be on Class B uses which LBN can control and which are not subject to permitted development rights.	The Council's objective for this policy approach is to ensure existing industrial capacity within Class E at the site is to be protected with like-to-like floorspace. Floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Use Class MA can be controlled and monitored. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E. However, the Council recognises the importance of	The Mayor accepts the approach taken by LBN.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes: J1.2 Implementation: All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location. J3 Implementation (All): Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances:	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			- the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified. Monitoring Framework - Key performance indicator 22: Target no net loss of floorspace. Monitor for location against designated employment land and non-designated employment sites. Monitor approvals (gains and loss) and completions. Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site allocations and other non-designated employment sites.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			which are included in the minor modification table.	
Reg19-E-015/038	N2.SA3 Connaught Riverside	Site/s: N2.SA3 – St Mark’s (Connaught Riverside) Comments: The allocation is clear that it is home to a designated industrial area (LSIS) in the site plan and as such LBN should note that Policy E6 of the LP2021 applies.	Comment noted. It is clear in the site allocation wording that development should prioritise industrial floorspace within the designated Local Industrial Location boundary, which is informed by the Employment Land Review, and employment uses should meet requirements as set out in Policy J1, which is in conformity with the London Plan Policy E6. The Council is satisfied that the plan remains sound without the proposed changes.	Noted and welcomed.
Reg19-E-015/039	N2.SA3 Connaught Riverside	Site/s: N2.SA3 – St Mark’s (Connaught Riverside) Comments: The focus should be to prioritise Class B uses as these are not subject to permitted development rights.	The Council's objective for this policy approach is to ensure existing industrial capacity within Class E at the site is to be protected with like-to-like floorspace. Floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Class MA can be controlled and monitored. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E. However, the Council recognises the importance of	The Mayor accepts the approach taken by LBN.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes: J1.2 Implementation: All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location. J3 Implementation (All): Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances:	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			- the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified. Monitoring Framework - Key performance indicator 22: Target no net loss of floorspace. Monitor for location against designated employment land and non-designated employment sites. Monitor approvals (gains and loss) and completions. Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site allocations and other non-designated employment sites.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			which are included in the minor modification table.	
Reg19-E-015/040	N2.SA3 Connaught Riverside	Site/s: N2.SA3 – St Mark’s (Connaught Riverside) Comments: The allocation is clear that the maximum throughput of Connolly’s Yard waste site needs to be re-provided elsewhere, either within the site itself or within London. To be consistent with Policy SI 9 of the LP2021 this would need to be secured before the site can be used for other uses.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is effective, and will be considered alongside the requirements London Plan in decision making. Further background information of how Newham’s work on the new East London Joint Waste Plan will address waste capacity is provided in Appendix 2 to this Statement of Common Ground, at Topic: Employment land demand (including and Land swap along Bidder Street SIL). The Council is satisfied that the plan remains sound without the proposed changes.	As noted on the Reg 19 response the site allocation for this site within the Newham Local Plan (Regulation 19) is clear that the waste capacity at this site should be re-provided or compensatory capacity identified. It is noted that the draft site allocation includes the requirement to re-provide the waste site or provide compensatory capacity, however this requirement could fall away when the updated East London Waste Plan is adopted.
Reg19-E-015/041	N4.SA2 Silvertown Way East	Site/s: N4.SA2 [and N4.SA3] Comments: The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity	Comment noted. It is clear in the site allocation wording that the employment uses should meet requirements as set out in Policy J1, which is in conformity with the London Plan Policy E7C where mixed use development will be supported at identified site allocations. Existing industrial capacity at the site is protected by Policy J3 which requires site allocations to re-provide employment floorspace for existing businesses or submit a Relocation Strategy	Noted, although a reference to E7C would be welcomed.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		on the site should be considered as part of a plan-led approach towards meeting the borough's industrial needs over the Plan period.	demonstrating reasonable endeavours to relocate existing businesses. In light of your other comments which raised concerns regarding the lack of control on permitted development right to protect industrial capacity within Use Class E, the Council recognises the importance of ensuring the Plan is positively prepared, justified, effective and in conformity with the London Plan, and has therefore made the following wording changes: J1.2 Implementation: All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location.	

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
			J3 Implementation (All): Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances: - the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified. which are included in the minor modification table.	
Reg19-E-015/042	N4.SA3 Canning Town Holiday Inn	Site/s: [N4.SA2] and N4.SA3 Comments: The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity on the site should be considered as part of a plan-led approach towards meeting	Comment noted. It is clear in the site allocation wording that the employment uses should meet requirements as set out in Policy J1, which is in conformity with the London Plan Policy E7C where mixed use development will be supported at identified site allocations. Existing industrial capacity at the site is protected by Policy J3 which requires site allocations to re-provide employment floorspace for existing businesses or submit a Relocation Strategy demonstrating reasonable endeavours to relocate existing businesses.	Noted, although a reference to E7C would be welcomed.

Comment Reference	Chapter/ Policy/Site allocation	GLA Regulation 19 comment	LBN response and position	GLA updated response and position
		the borough's industrial needs over the Plan period.	The Council is satisfied that the plan remains sound without the proposed changes.	

- 5.3. Further to the above, Appendix 2 provides more background related to two further issues raised by London Borough of Newham under the duty to cooperate, specifically in relation to:
- Newham meeting its duty under the London Plan Policy G3 to consult with the GLA and neighbouring boroughs on the its Metropolitan Land Review, at [Topic: Newham's Metropolitan Open Land review](#); and
 - Newham's concerns raised with regards to GLA's programme of work on the Land4LDN SHLAA and resulting revised borough housing targets, at [Topic: GLA assumptions behind the London emerging SHLAA \(2025\)](#)
- 5.4. The Mayor of London is content with London Borough of Newham's engagement approach undertaken during the DtC process, noting that neighbouring boroughs and the GLA have been consulted as per London Plan policy.

6. Governance agreements

- 6.1. This statement of common ground will be reviewed:
- 6.1..1. Whenever agreement is reached on any outstanding matters. Or
 - 6.1..2. At key milestones in progress towards addressing strategic matters. Or
 - 6.1..3. At each subsequent key stage of the plan making process, as it progresses towards adoption.
- 6.2. The table below outlines existing cooperation forums that will be used to continue to engage each other and progress the key strategic matters.

Key Strategic Matter	Forum	Details/frequency of the forum
Housing target	GLA's London Plan borough engagement programme, including through the All London Boroughs Planning Officers meetings.	ALBPO meets monthly to discuss a range of issues of importance to the London boroughs and the GLA. The GLA will provide the timeframe and format for engagement on the new London Plan in due course.
	2024/25 SHLAA programme	As set out by the GLA.
Gypsy and Traveller need	GLA's London Plan borough engagement programme, including through the All London Boroughs Planning Officers meetings.	ALBPO meets monthly to discuss a range of issues of importance to the London boroughs and the GLA. The GLA will provide the timeframe and format for engagement on the new London Plan in due course.
Evidence base in support of London's growth: employment, town centres	GLA's London Plan borough engagement programme, including through the All London Boroughs Planning Officers meetings.	ALBPO meets monthly to discuss a range of issues of importance to the London boroughs and the GLA. The GLA will provide the timeframe and format for engagement on the new London Plan in due course.

Key Strategic Matter	Forum	Details/frequency of the forum
Review of the London Protected Views Framework	GLA's London Plan borough engagement programme, including through the All London Boroughs Planning Officers meetings.	ALBPO meets monthly to discuss a range of issues of importance to the London boroughs and the GLA. The GLA will provide the timeframe and format for engagement on the new London Plan in due course.
Waste management and the East London Joint Waste Plan	East London Joint Waste Plan making processes	The working group meet regularly, and will set up further duty to cooperate discussions with boroughs seeking to use east London's Identified Capacity Surplus.
	London Waste Planning Forum	Held quarterly to discuss strategic waste matters affecting London.

7. Signatories

7.1. We confirm that the information in this statement and referred to documents reflects the joint working to date undertaken between London Borough of Newham and Transport for London towards addressing the identified strategic matters.

Signed on behalf of London Borough of Newham:  Name: Danalee Edmund Date: 24 November 2025 Position: Interim Planning Policy Manager, Planning & Development Directorate	Signed on behalf of Greater London Authority:  Name: Lucinda Turner Date: 24 November 2025 Position: Assistant Director, Planning & Regeneration
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**Appendix 1: Agenda and minutes of Statement of Common Ground
meeting held on 20th January 2025**

**Statement of Common Ground between:
London Borough of Newham and Greater London Authority**

Meeting Date: 24.01.2025

Time: 11:30-13:00

Venue: Microsoft Teams

Present:

- Ellie Kuper Thomas, Policy Manager, LBN
- Claire Laurence, Principal Policy Planner, LBN
- Cinzia De Vincenziis, Principal Policy Planner, LBN
- Sara Chiong, Senior Planner, LBN
- Antonia Marjanov, Principal Policy Planner, LBN
- Hassan Ahmed, Team Leader, London Plan and Strategic Planning Team, GLA
- Amy Tempest, Senior Strategic Planner, GLA
- Emma Scott, Senior Strategic Planner, GLA
- Lisa Fairmaner, Head of London Plan and Strategic, GLA

Agenda and Notes

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
1. Introductions (2min)	• Self-introduction by the LBN and GLA teams. • LBN introduced the objective of the meeting. • GLA shared the agenda of the meeting.	
2. Housing: a. Delivery/target b. Sites capacity testing, and new SHLAA system c. Publication of capacity figures for each site d. Affordable housing approach e. Gypsy and Traveller need	Delivery/target • LBN noted GLA's review of Reg. 19 response and in particular the non-conformity concern raised regarding the timeframe within which the London Plan housing target will be achieved. • LBN noted that the GLA have not raised concerns regarding our broader spatial strategy, design approach or employment land protections. LBN stated that it would be useful for the examiner for the GLA to clarify their view regarding Newham's ability to deliver against its housing target to 2029, as there is agreement between the parties that individual site capacity has been optimised. Rather, the	• LBN to set out in a statement the way that the delivery phasing is planned, treating separately the timeframe to 2029 and beyond 2029, and showing the additional work done to try push delivery forward.

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	challenge is phasing and speed of delivery. - GLA clarified that their position is that it's not tenable to not meet the housing target. Given gap between existing delivery rates and the growing need in London, GLA need to take a strong stance. GLA want to see what options were/are looked at, outside the plan-making process, to bring sites forward sooner (CPOs, mayoral development corporations, large scale masterplans/design codes etc.). - LBN agreed to highlight ongoing work in Beckton Riverside and for GLA and Council-owned land, and how this has informed the delivery target for the Local Plan. - GLA noted they are happy to treat any additional capacity derived on the basis of transport infrastructure as separate to a baseline delivery figure. - GLA keen to see support for small sites and incremental change to existing neighbourhoods, including upward extensions, as part of demonstration of multiple tools being used to address housing delivery. - LBN highlighted the small sites design guide we have published and suggested that support for this be included in the SoCG. - LBN offered to re-share the capacity figures assumptions for each sites, as was shared previously. - GLA agreed they can re-review this work, but noted the change in context from discussions at an earlier stage of Plan-making, with different expectations now being made of the GLA, and therefore of boroughs. - The GLA highlighted that this was a challenging time for plan-making: operating in an extraordinarily fluid situation regarding changing housing targets and approaches to meeting that target. Now GLA have a clear end point	

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	of 88,000 homes a year, and a clearer approach for how the new London Plan is going to meet this is likely to emerge over the coming months. • GLA London Plan review will likely plan for 10 year supply with disaggregated housing targets for boroughs, depending on infrastructure delivery. GLA will seek to demonstrate they have done all possible to support delivery. • LBN stated that there is a tension between requiring such flexibility and the need for certainty to progress borough local plans under the NPPF's transitional arrangements. • The GLA advised that LBN should provide a clear statement regarding our approach to meeting the London Plan target to 2029 and our approach beyond 2029 and how both align to the requirements of the London Plan 2021. • LBN clarified that we will meet the London Plan target, but by 2034, rather than 2029, due to realistic phasing assumptions of updated design-based capacity assumptions. Post meeting the London Plan target, additional site capacity has been based on 2017 SHLAA data, which we consider in line with the London Plan requirements. • The GLA recognised the importance of a realistic and deliverable Plan. Sites capacity testing, and new SHLAA • LBN stated that they thought it would be useful for the SoCG to clarify the changing assumptions behind the SHLAA the GLA is currently developing (which Newham is inputting into) and the 2017 SHLAA, which has informed LBN's Local Plan, given expected publication of early new SHLAA findings in Spring 2025. LBN noted that if the GLA's new SHLAA included updated, reasonable phasing assumptions, this could help update the Local Plan trajectory. • The GLA agreed this could be helpful but recommended LBN focus on the current	

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	London Plan (2021) approach, for the London Plan period (to 2029), and seeking to maximise delivery after this plan period. Publication of capacity figures for each site • LBN reiterated that they do not think it is necessary to publicly share individual site capacities, nor a requirement of the London Plan, but are happy to share full data confidentially with GLA for any further assessment. • GLA retain their preferred approach and consider there are benefits for site capacity assumptions being published; however, confirmed it is not a conformity issue and noted that LB Ealing's Plan did not publish site figures either. Affordable housing approach • LBN noted the strong political push for the borough's affordable housing target. • GLA noted this, but will continue to consider it a non-conformity issue. The GLA flagged that this is consistent with their approach to Richmond's (noting the Inspector supported the GLA's position) and Wandsworth's Local Plans. Gypsy and Traveller need • LBN set out that our Gypsy and Traveller need was established alongside the SHMA (2022), but acknowledge that the emerging London-wide needs assessment work the GLA is undertaking is likely to increase LBN's need figure. However LBN will struggle to meet either figure (e.g. due to substantial sections of the borough being in flood zones), and asked whether the SOCG can note that GLA are working on strategically addressing the needs identified in its recent London-wide assessment. • GLA noted that their approach to addressing need had not yet been agreed and it may be left to boroughs to	

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	address the need, rather than strategic policies. - GLA advised LBN to ask neighbouring boroughs to help meet this need. - LBN confirmed they had done so unsuccessfully, but would be setting this out in more detail in a topic paper.	
3. Tall buildings strategy a. Height parameters definition b. London View Management Framework	- LBN set out their concern with the change in GLA's direction in Reg. 19 comments compared to Reg. 18. LBN considers that the current policy meets the requirements of D4 of London Plan and that the GLA's proposed approach could risk undermining the spatial strategy. - GLA prefer the terminology of 'appropriate heights' rather than maximum, for practical reasons to allow for decision-making flexibility. They stated that it implies that 'within reason' there can be flexibilities for small differences, while still being able to resist proposals when significant increases are proposed. - GLA highlighted that most recent Plans had adopted this approach to terminology. - Newham asked GLA to clarify which LVMF strategic views effect Newham. GLA shared the link to the mapping.	LBN to consider if the wording change proposed by the GLA is suitable, which can then be agreed via the SOCG
4. Employment land a. Approach to employment land b. Data centre c. Approach to specific employment sites	Approach to employment land - LBN asked the GLA to confirm their view on LBN's approach to protecting employment land in the borough. - The GLA clarified that LBN should focus on assessing and addressing Use Class B demand in its employment policies, rather than also including Class E uses. - LBN clarified that general town centre uses are not being counted in J1 policy, but that some Class E uses are an important part of the mix of uses on our industrial sites. - The GLA noted that Class E uses should be given less of a focus due to freedoms within Class E and PD rights. They are also concerned about the risk they can pose by leading to residential uses and	- LBN to review data and consider if possible to break down the B uses vs E(g) ii/iii uses and share with the GLA - GLA suggested a further meeting may be needed with the employment team to clarify the position and resulting policy approach.

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	therefore agent of change challenges within SIL. • The GLA would therefore like a clearer policy focus for SILs focusing on B uses, and less on 'light industrial uses'. • LBN noted the use of conditions to ensure limitations to Use Class freedoms to those suitable to employment land, primarily E(g) ii and iii. • LBN asked for further clarity on the GLA's comments regarding the intensification of SIL. LBN's policy approach is to support intensification on all SILs, rather than specifying specific SILs. • The GLA's view is that the Plan should be more specific on need for B-uses and which sites will meet that need via intensification. LBN asked the GLA to clarify if they would support intensification on all SIL. GLA clarified that the policy position should be demonstrated by the level of need. Data centres • LBN asked when the GLA study will be undertaken/published. GLA noted that this is not yet known. Approach to specific employment sites • LBN noted that the Bidder Street land swap point was broadly addressed through the discussion on use class B and SIL. • LBN asked if approach to existing employment use on site at Sugar House Lane is suitable. • GLA agreed the approach is reasonable.	
5. Prioritisation of transport contributions	• LBN set out the policy and approach, and noted it does not fully align with the London Plan priorities, but that further flexibilities have been added to the Plan at regulation 19 stage. • LBN have also engaged with TFL on this. TfL noted they will continue to emphasise the need to prioritise transport infrastructure, but acknowledged the approach in Newham	To progress via TFL SOCG

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	currently works and consider the policy flexibilities will facilitate the delivery of transport infrastructure requirements. GLA noted they are happy to be led by the TFL position	
6. Beckton Riverside - capacity and DLR extension - Beckton Sewage works odour	- LBN asked for the SOCG to acknowledge the existing public sector work on this site, and to agree that early development in the north of the site would undermine the case for the DLR extension. LBN and TFL have agreed this approach as part of recent SOCG discussion. - GLA noted the joint work on this site and suggested that as the site and DLR delivery is so key for housing delivery that the matter should be part of the housing section of the SOCG.	
7. Newham's Town Centres Network - Silvertown Local Centre extension - Beckton Riverside future town centre and Gallions Reach Retail Park - Demand for visitor accommodation / hotels	- LBN summarised the work undertaken to update Newham's Town Centre Network as part of the Local Plan refresh, including the scale of all centres. LBN also noted its approach to retail parks and hotels continues to align with the national and London Plan 'town centre first' principles. - LBN noted comments made by the RDT and developers on these matters - The GLA agreed that there were no concerns raised at Reg. 19 with Newham's Town Centre Network review. - The GLA recognised that Gallions Reach is currently identified as a potential major centre in the London Plan (depending on DLR extension) but understood LBN's view that more recent evidence via the Retail and Leisure Study and OAPF work suggested that a district centre may be more appropriate. It was agreed that this should be considered via the London Plan refresh. - GLA expressed they are supportive of Newham's approach to manage the operation of Gallions Reach through a town centre first approach, in line with London Plan policy SD7.	LBN to progress through engagement in London Plan review evidence base.

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	GLA expressed they are supportive of LBN's approach to redirect hotels within town centre locations, and suggested that the Islington Local Plan examination may provide a useful example regarding balancing the need for homes with hotels. The GLA suggested discussing further with Michael Carless at Islington.	
8. Metropolitan Open Land review	• LBN asked the GLA to clarify what the scope of any future MOL evidence is likely to be to inform the London Plan refresh, in light of recent NPPF changes to green belt approach and GLA's recent note to boroughs. • GLA considered it to be too early in the new London Plan process to have a public statement, but suggested the statement submitted to Enfield examination may be helpful in setting out direction of travel. • LBN noted that the Enfield statement primarily related to green belt and that MOL has a different function to green belt. Therefore we would like to understand the extent to which the approach may be disaggregated from the approach to green belt in the London Plan review. • GLA noted that any future published statement from GLA will be a material consideration at examination, but will have less weight than the current NPPF and London Plan under which the LBN Local Plan will be examined, so advised LBN to continue to use the adopted London Plan approach to assess MOL.	
9. Waste and site allocations	• LBN sought further collaboration through the plan-making process for the new East London Joint Waste Plan (JWP), and that this will be set out in the SOCG • LBN clarified that, regarding the GLA's comments on the Connolly's Yard / Jighand Ltd. site on Connaught Riverside site allocation, we consider that the existing policy position provides a sufficient safeguard and we will secure re-provision before redevelopment.	LBN and GLA to continue to engage via JWP

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	London Plan policy requirements will be used in decision-making. • The GLA agreed. • LBN noted that the Silvertown Quays existing waste site cannot be protect because it has been released as part of an earlier application, prior to the London Plan(2021)position. • GLA noted that, as long as capacity history is picked up through the JWP and addressed, they are happy to agree with this position for this site.	
10. AOB (3min) a. GLA's view on Royal Docks Team's objections to Policy GWS2: Water Space	• LBN noted comments made by the RDT • GLA recommended that the concerns are picked up separately with the RDT	LBN will share the meeting notes and a draft statement of common ground

Appendix 2 – Duty to Cooperate Discussion Topics – background to Newham’s response to matters raised in GLA’s representation to the Submission Draft Local Plan (Reg. 19)

Duty to Cooperate Discussion Topics

Topic: Housing target delivery (including Beckton Riverside capacity and DLR extension, and Beckton Sewage works odour)

- 1.1. Newham's current housing target is set out in the London Plan (2021). This target was informed by the findings of the Greater London Authority's Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment, both of which were published in 2017. In addition to Newham's target, in order to prepare for developing a plan for the whole of Newham post LLDC transition, correspondence with the GLA has confirmed Newham's proportion of the LLDC's London Plan housing target, which is an additional 14,800 homes over the Plan Period, on top of Newham's target to deliver 32,800 homes between 2019/20 and 2028/29. Combined, this means that LBN's housing target is 47,600 new homes for that period, which equates to an average of 4,760 a year.
- 1.2. The Mayor of London notes that Newham's Draft Submission Local Plan (regulation 19) proposes the delivery of an additional 18,000 homes up to 2038, which represents half the current annual target. It is noted that LB Newham have undertaken further work to update these figures, which is provided in paragraph 1.6 below.
- 1.3. Maccreeanor Lavington were commissioned by Newham Council, as part of delivering the Newham Characterisation Study, to capacity test sites to be included as site allocations in the draft Local Plan (Regulation 18). This work provided design principles for site allocations, a housing capacity figure to inform the housing trajectory and the typologies in the Local Plan viability appraisal. For some sites a bespoke approach was taken: Stratford Waterfront South due to the uses (a higher education campus and student housing) being delivered on this site; and Carpenters Estate, which has just completed an extensive co-produced masterplanning processes and so did not undergo capacity testing but design principles were developed to reflect the estate masterplan. Further information setting out the methodology and assumptions behind Newham's housing capacity testing has also been published as part of the [Site Allocation and Housing Trajectory Methodology 2024](#).
- 1.4. Throughout 2023, Newham held multiple meetings with GLA officers on our housing target. During these discussions Newham provided a breakdown of capacity on site allocations in the Draft Local Plan, and how these compared with the capacity assumptions and phasing in the 2017 Strategic Housing Land Availability Assessment. During these discussions, officers from the GLA broadly agreed that only a small proportion of SHLAA capacity had been excluded from our housing requirement figure. Instead, it was considered our issues in meeting our housing target were primarily linked to the delayed phasing on a number of Newham's site allocations in the adopted Local Plan, which have been taken forward in the Draft Local Plan. It was suggested that Newham prepare a topic paper on housing delivery that should be published in support of the Draft Submission Local Plan housing target.
- 1.5. In preparation for the transition of powers from the LLDC to Newham, and as part of the preparation of the new Newham Local Plan, the LLDC shared its housing trajectory position and phasing, which was informed by engagement with developers. This data was incorporated

into the LBN trajectory at Regulation 18 stage, and while there have been some updates to phasing timescales due to planning activity that resulted in schemes coming forward earlier or later than the LLDC trajectory anticipated, overall the approach remains broadly aligned. Newham approached the LLDC in order to progress a statement of common ground before the transition of powers, and the GLA also attended the meeting held on 28th October 2024. The LLDC acknowledged that they had also experienced significant delays in starts and completions over the past few years, including during 2023/24. The final LLDC housing trajectory was shared with Newham in November 2024 and was used to check for consistency with the Local Plan Regulation 19 trajectory. This data has informed an updated housing trajectory to support the submission of the Local Plan to the Planning Inspectorate.

- 1.6. Newham's housing target in the Newham Draft Submission Local Plan proposes a range housing target, which seeks to deliver a net increase of between 51,425 and 53,784 quality homes between 2023 and 2038.
- 1.7. Following the close of the starts and completions exercise for financial year 2024/25, Newham has updated its housing trajectory. Further to discussions with the GLA, Newham has discussed two options for the phasing of capacity within the trajectory:
 - Option A, which assumes as per the Site Allocation and Housing Trajectory methodology note that individual sites or plots with planning permission will deliver no more than 200 units per annum; and
 - Option B, which relies on information supplied by the developers on phasing expectations within planning application documents. This approach places no upper limit on year-on-year delivery assumption for large sites.
- 1.8. These options were outlined to the GLA on 16th October 2025, and copies of the individual trajectories for each option were supplied to the GLA. Newham's preferred option moving forward is Option B, noting that this option provides for a justified and effective target that seeks to address shortfalls in delivery in recent years.
- 1.9. Using the delivery figures that informed Option B, Newham now estimates that the delivery in the borough will be between 45,611 and 53,954 new homes between 2027 and 2042. As part of the examination of the plan to date, Newham has agreed with the Planning Inspector that a 20% buffer is to be applied to Newham's 5-year land supply target, which will be measured against financial years 2027/28 to 2031/32. Newham's target is stepped across the plan period rather than expressed as a consistent number year on year, noting the large-scale, complex site allocations that constitute the bulk of Newham's planned housing delivery. Therefore, we propose to split the plan period into separate phases, with annual delivery targets as follows:

Annual housing targets			
Phase 1a (Short term – London Plan period)	Phase 1b (Short term)	Phase 2 (Medium term)	Phase 3 (Long term)
27/28 - 28/29	29/30 - 31/32	32/33 - 36/37	37/38 - 41/42
4,760	2,542	2,631	3062

1.10. For the short-term phase of the target (the five-year land supply years) Newham has set our target:

- to align with the London Plan target in the first two years, noting this period overlaps with the end of the London Plan housing target period; and
- the remaining five-year land supply years at a level where we can deliver a buffer added to the five-year land supply (as indicated by the Planning Inspector).

1.11. The short-term annual targets are based on higher range capacity expectations, and allowing for a buffer to be met, while the medium- and long-term phases are based on the lower range trajectory expectations, noting higher delivery expectations are dependent on large scale infrastructure being delivered in these years. In years beyond the London Plan period delivery expectations are also lower noting the delivery of the majority of the former LLDC area sites.

1.12. It should be noted that the London Plan target expected is to be achieved across financial years 2027/28 and 2028/29 (the two London Plan years which overlap with the five-year land supply period). An extract of anticipated completions over the new Local Plan housing target period is provided below (with the 5-year land supply years outlined in red):

Annual expected completions (higher range trajectory)							
27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35
6148	4530	4670	3816	2949	3441	3124	2951
35/36	36/37	37/38	38/39	39/40	40/41	41/42	
2955	2461	3500	3512	3520	3327	3050	

1.13. A breakdown of the different types of housing delivery over this period is provided below:

- Site allocations: 42,136
- Small sites: 5,700
- Windfall (SHLAA and Lapsed sites): 3,328
- Other (permissions not allocated in the Submission Local Plan): 2,790

1.14. The table below summarises the housing delivery trajectory against the London Plan (2021), using cumulative completions to 2024/25, to 2028/2029 and to plan period end of 2041/42.

	LBN including LLDC area (i.e. total)	LBN minus LLDC area	LLDC area
Cumulative completions / delivery 2019/20 – 2022/23	11,650	7,242	4,408
Cumulative housing shortfall against London Plan (2021) 2019/20 – 2022/23	-7,390	-5,878	-1,512
Cumulative completions / anticipated delivery 2019/20- 2028/29	32,188	20,971	11,217
Cumulative housing shortfall against London Plan (2021) 2019/20 – 2028/29	-15,412	-11,829	-3,583

Cumulative completions / anticipated delivery 2019/20-2041/42	75,464	57,125	18,339
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- 1.15. While Newham have identified sufficient housing capacity to meet the London Plan housing target, the projected phasing of delivery means that Newham will not be able to meet the London Plan housing target within the period of the London Plan, to 2029. This is primarily as a result of delays to the delivery of large sites, particularly site allocations, against the assumed phasing in the 2017 Strategic Housing Land Availability Assessment which informed the borough's target in the London Plan.
- 1.16. As outlined in the table above, Newham anticipates delivering a total of 32,188 homes across the London Plan period. This includes 17,594 completed units between financial years 19/20 and 24/25, and a further 14,594 units delivered across the remaining years of the London Plan period. The table above also demonstrates that Newham is expecting to be able to make up (and surpass) its Local Plan (2021) shortfall by 2033/34.
- 1.17. In October 2023, a [Joint Position Statement](#) was published outlining a number of recommendations for interventions needed to safeguard delivery of homes in London, with a particular emphasis on affordable housing. The London Housing Delivery Taskforce, convened by the GLA and London Councils, consisted of leaders from across London's housebuilding sector. Along with identifying interventions needed to safeguard delivery of homes in London, the position statement also outlined the current challenges impacting housing delivery in London. The report provides a helpful summary of the challenges that have affected housing delivery in Newham in recent years, and which have resulted in the delivery assumptions set out in the [Site Allocation and Housing Trajectory Methodology 2024 and the resulting](#) stepped housing trajectory set out within the draft Submission Local Plan. These include the impact of the emerging second staircase requirement, which has resulted in the redesign of a significant number of applications on strategic sites, including Twelvetreets Park and Former Bromley By Bow Gasworks, Connaught Riverside and Silvertown Quays, as well as further sites subject to pre-application discussions, causing delays to delivery.
- 1.18. In light of the above, and as advised by the GLA, Newham approached all neighbouring boroughs and Croydon, to understand whether there is any available housing capacity above the London Plan (2021) individual targets, which could assist Newham in meeting its London Plan housing target within the London Plan period (2019/20 – 2028/29). However, none of the boroughs are in a position to support Newham's housing delivery over the plan period to 2028/29, and this has been set out in the Duty to Cooperate Addendum (2025) and the Statements of Common Ground that have been signed with neighbouring boroughs. Nevertheless, it was noted that Tower Hamlet's housing target in the Tower Hamlets Draft Submission Local Plan provides a small buffer for the first 5 years in the London Plan (2021) period, which then reduces in the last 5 years. London Borough of Newham note this development trajectory is the inverse of Newham's anticipated growth, with the majority of our growth projected in the later Local Plan period. Given the geographical proximity and similar housing markets, there may be a beneficial relationship between the two boroughs' trajectories in terms of cumulatively meeting the London Plan (2021) housing delivery target.

- 1.19. The GLA notes, that since that advice was provided, a new cumulative housing need has been established for London by the Government's new Standard Methodology of 88,000 homes. As such it is the Mayor of London's expectation that all boroughs should be seeking to optimise housing delivery beyond their London Plan 2021 targets. As such it is no longer considered that boroughs assisting each other to meet their London Plan 2021 target could overcome this general conformity issue.
- 1.20. At all relevant stages of the Local Plan making, London Borough of Newham has engaged with the GLA on its approach to and outcomes of sites capacity modelling (see details in the [DtC Statement](#) 2024 and the [DtC Addendum](#) 2025). In their response to the Local Plan consultations, the Mayor of London has not expressed concern with the process used to establish the proposed capacities, albeit at Reg. 19 requested that the individual site allocations' capacity figures be published, nor the broader spatial strategy for Newham (e.g. approach to green space or employment land protection). Nevertheless, the GLA challenge the expected phasing and speed of delivery of the residential capacity in Newham, and have requested LBN to indicate how all reasonable steps have been taken to help speed up delivery of the sites.
- 1.21. London Borough of Newham has worked positively and proactively to help bring forward a number of complex sites. This work is summarised in the table below. It was not possible to calculate the impact of these actions on the resulting phasing of the sites, and as such the [Site Allocation and Housing Trajectory Methodology](#) 2024 utilised a standard methodology across all sites. However these actions should result in faster delivery, helping Newham to deliver more of its housing capacity earlier in the Local Plan period.

LBN actions to accelerate delivery	Details of context and actions taken.
Beckton Riverside delivery	Beckton Riverside is the borough's largest site allocation and a key deliverable of the Royal Docks and Beckton Opportunity Area. The Council, the GLA, TfL and Homes England have been working collaboratively over a number of years with the landowners and other stakeholders to address the complex infrastructure requirements (DLR extension, interaction with Beckton Sewage Treatment Works, utilities infrastructure and safeguarding for a road bridge) and ensure the coordination required to optimise and deliver the site as quickly as possible. In December 2019, a DLR extension to Thamesmead was formally proposed by Transport for London as part of the draft Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF). The Royal Docks and Beckton Riverside OAPF (2023) continued to highlight the important role of this DLR extension, with one of the key objectives of the OAPF to outline the opportunities associated with a future DLR extension to Beckton Riverside and how these could be supported.

	In May 2023, Newham's Cabinet approved the submission of the Strategic Outline Case for the Thamesmead and Beckton Riverside Public Transport Programme to Government by Transport for London on behalf of the Programme partners and approved £500k contributions to the programme over the next 4 years, as part of an overall funding package of £10-12m by the Government and other stakeholders, in order to enable further feasibility work for public transport interventions and develop a comprehensive business case and consents programme. In June 2023, the Strategic Outline Business Case for the extension was submitted to HM Government. In 2024, TfL commenced a consultation on the transport options on proposals to extend the DLR to Beckton Riverside and Thamesmead. Following this, TfL have decided to progress with work to develop the DLR extension to Beckton Riverside and Thamesmead as their preferred option. As part of this work they also confirmed they would progress discussions with Government on the potential removal of safeguarding for the Thames Gateway Bridge. During the Local Plan making process, Thames Water have raised new concerns with regards to proximity of residential development to the sewage works. Due to the timing of both the development of the Opportunity Area Planning Framework and planning application process, which ran alongside the development of the Local Plan, further discussions have taken place throughout 2022 and 2023 with Newham's planners, environmental health and regeneration colleagues, the GLA, Thames Water and the landowners regarding the potential odour impact and need for an odour impact assessment. St William agreed to fund a further independent odour impact and mitigation study. Newham Council, Thames Water and St William agreed the brief, and WSP was appointed to undertake the work in 2022. Further information was shared by Thames Water to inform the study. A draft of the study was shared in January 2024 which indicated that the odour zone would have some impact at the northern portion of the site, but was not as extensive as had been suggested by Thames Water. A discussion on the interim Odour Report with landowners, the GLA, Transport for London and Homes England was held in May 2024. It was agreed that external verification of the two reports, and an additional report undertaken on behalf of ABRDN/Aberdeen, was required, which was funded by Homes England and completed in July 2025. The report confirms the areas most likely to be at risk of odour from the Beckton Sewage Treatment Works and recommends that further odour assessments and mitigation measures be undertaken at planning application stage. It also confirms that the findings of the St William Odour Report are sound and the masterplanning of Phase 1 planning application can proceed on the basis of its findings.
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	St William have progressed an application for part of the site, Phase 1, (Newham reference 24/00989/OUT), which was validated in October 2024. The application has received Resolution to Grant in October 2025. In late 2024, discussions took place to seek ATLAS support to unlock the site. Consideration has also been given at the delivery board meetings that Beckton Riverside be considered a suitable site for new town designation via the New Towns Taskforce. Instead of ATLAS support, in February 2025, Homes England, at LB Newham's request appointed a consultant to develop a delivery programme to align the strands of work taking place to support the delivery of the site. They are also exploring the potential of funding a dedicated programme officer to support the delivery of the site in 2025/26.
Stratford Station capacity enhancement	Stratford Station, along with Stratford's two bus stations, form a key strategic public transport interchange for London. It has become the fifth busiest station on the entire National Rail network, the sixth busiest station on TfL's network, and is also the busiest bus station in London. Since 2001, Stratford Station has seen the largest absolute amount of passenger growth of any station in the UK. The station was not designed to accommodate the volume of passengers now using it and this has resulted in unacceptable levels of overcrowding, regular station closures and poor passenger experience. In 2019, the London Legacy Development Corporation (LLDC), Newham, Network Rail and Transport for London (TfL) started to prepare a Strategic Outline Business Case (SOBC) for the long-term redevelopment of the station and the surrounding area to address capacity and connectivity issues. The Strategic Outline Business Case was submitted to the Government in July 2023. This work is supported by a dedicated programme officer who sits between the LLDC and LB Newham. Further work is being undertaken to develop this work and Newham will continue to work with the LLDC (in their remaining mayoral development corporation role), London Borough of Waltham Forest and other partners to support this work and to ensure the Local Plan can support the delivery of necessary station infrastructure. Newham is committed to ensure suitable alignment between the emerging Plan and the business case. The Submission Draft Local Plan includes a site allocation for the Stratford Station site, which set out infrastructure requirements and development and design principles for different plots. Significant overcrowding is not expected to occur until after the Local Plan timeframe, but early agreement on funding improvements will help unlock and accelerate development, not only in the surrounding area (where the reconfiguration of the station and bus station would

	unlock some developable land) but more significantly in the wider area and growth corridors within London, which rely on Stratford station as a key interchange.
Dedicated Site Allocation support to applicants	Newham has a large number of significantly sized site allocations, in particular around the Royal Docks, some of which are owned by the GLA Land and Property Ltd, which the Council's planning team is actively engaged in enabling the delivery of. This has included offering dedicated planning officers, as part of the Planning Performance Agreement offer, to provide a bespoke and responsive service to provide early advice and timely decision making. This has been taken up on four strategic sites. In addition, for sites where the GLA has ownership, the Council shares the resourcing of the dedicated Royal Docks Team, who are tasked with enabling the wider regeneration of the Enterprise Zone, including the delivery of key sites. The planning service regularly engage with this team, including through the creation of site specific boards to provide project updates and coordinate decision making and delivery.
London Legacy Development Corporation transition project officer	On 1st December 2024, the Local Planning Authority function of the LLDC transferred back to the four host boroughs. Newham's portion of the LLDC is the largest of the four boroughs and the borough has the largest number of development sites in delivery, in planning and in the pipeline. Newham consider it inevitable that such a transition will result in a period of slower delivery, especially as fewer schemes than anticipated were permitted before transition. A view shared with the LLDC. However, to reduce this as much as possible and to enable a smooth transition, the Council self-funded a dedicated transition project officer and two planning officers to ensure that there can be timely support for the delivery of sites, through the discharge of conditions and delivery of obligations as well as sufficient resource to manage the large remaining workload of new sites and applications transferring from the LLDC.
Council's own housing delivery programme	Alongside the housing delivery being enabled by the planning service, the Council (both our internal regeneration team and the Council's wholly owned housing company, Populo) is actively engaged in delivering three significant estate regeneration schemes: at Carpenters, Canning Town, and Custom House, including undertaking CPOs where required. This is alongside a pipeline of new housing sites and smaller infill schemes. An internal Housing Delivery Board, which planning attend, allows for early discussions to overcome challenges and ensures the timely delivery of the projects.

- 1.22. London Borough of Newham has also prepared additional design guidance to support delivery of small sites (below 0.25ha), as part of the overall package of measures to support housing delivery in the borough. The [Newham Characterisation Study Small Sites Intensification Guidance](#) (2024) reflects GLA's Small Site Design Codes London Plan Guidance (2023) and was published as part of the evidence base at Regulation 19 stage. This document classifies small sites into a series of site types typically found in Newham, based on their common conditions, opportunities and constraints, and will support the future optimisation of capacity on small sites to ensure that Newham meets its London Plan small sites target, an uplift on past trend delivery rates.

Topic: GLA assumptions behind the London emerging SHLAA (2025)

- 1.23. London Borough of Newham has worked extensively with the GLA in the preparation of the 2024/25 SHLAA, which will support the update to the London Plan and delivery against the cumulative housing need for London of 88,000 homes per year established by the Government's new Standard Methodology. A large number of sites in the Newham Local Plan that form part of this process were previously assessed as part of the 2017 SHLAA. However, in addition to updates in the status of these sites, the methodology and assumptions behind the 2024/25 SHLAA are different to those underpinning the 2017 version, and as such may result in a different set of numbers. It is expected that this new data will be published ahead of Newham's Local Plan public Examination.
- 1.24. Newham's Local Plan has also incorporated data from the 2017 SHLAA, albeit many sites have since been updated with permission data and design-led capacity testing, as set out in the [Site Allocation and Housing Trajectory Methodology 2024](#). The methodology and assumptions for the 2024/25 SHLAA have not yet been published. However, there are likely to be differences in assumptions between these two approaches. Therefore Newham has raised to the GLA the need for the future publication of the 2024/25 SHLAA to be accompanied by a methodology note outlining the process and assumptions behind its data, so that any differences can be understood by the Inspector examining Newham's Local Plan.

Topic: Publication of capacity figures for each site allocation

- 1.25. London Plan Policy D1.B sets out that, following the design-led approach (set out in Policy D3 Optimising site capacity through the design-led approach) boroughs should establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses.
- 1.26. In their Regulation 19 response, the GLA stated that site allocations should set out the individual capacity assumptions in order to help explain Newham's housing target in relation to its London Plan target, and so that stakeholders can engage in the process more easily. This was not raised as a general conformity issue, but rather as a concern.
- 1.27. Newham's capacity assessment and phasing of the site allocations was previously shared with the GLA (see details in the DtC Statement, Newham's housing target section, pg. 18), and

during the meeting on 24th January 2025 the Council offered to share these again if needed. The GLA outlined that the change in national context, namely the publication of the Local Housing Need figure for London being 87,992 homes per annum, meant that previous advice about how to arrive at annual housing figures beyond 2029-30 may be considered out-of-date where they result in a significantly lower housing target than the current housing target for 2019-20 to 2028-29. Newham will therefore continue to engage with the Greater London Authority on delivery against their current housing trajectory and any shortfall that will need to be made up in a later period, including sharing the recent design-led capacity testing undertaken across Newham's Draft Submission Local Plan site allocations.

- 1.28. The Newham Local Plan site allocations, as published at Regulation 19, include design principles for how sites should be optimised for housing as well as requirements for different types of use, in line with the requirements of London Plan Policy D1.B.
- 1.29. Following submission for examination, Newham's capacity assessment of the site allocations was provided to the Inspector as part of our response to his preliminary questions. This has been published on the examination webpage as:
 - ED003a- Topic Paper - Site Capacity Study Summary - Part 1 (PDF)
 - ED003b- Topic Paper - Site Capacity Study Summary - Part 2 (PDF).

Topic: Affordable housing approach

- 1.30. The NPPF sets out that local planning authorities should assess and plan to deliver the housing needs of different groups in the community, including those who require affordable housing. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site as part of major developments.
- 1.31. London Plan (2021) Policy H4 set out a strategic target for 50 per cent of all new homes delivered across London to be genuinely affordable, with the 'threshold approach' detailed under Policy H5 being a key mechanism for delivery. Policy H6 sets out the preferred affordable housing tenure mix, with 30 per cent each for low cost rent and intermediate housing products and the remaining 40 per cent to be determined by boroughs.
- 1.32. Policy H3 sets out Newham's expectations for affordable housing delivery, recognising the pressing need to deliver genuinely affordable homes to meet both Newham and London's wider housing needs. In particular, Newham residents need access to more social rent homes. Policy H3 therefore requires major housing development to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as intermediate housing.
- 1.33. The Newham Strategic Housing Market Assessment (SHMA) sets out that 54 per cent of housing need across the plan period is for affordable homes, with 66 per cent of this need being for social rent homes. This is due to the multiple, and often overlapping, housing issues our residents face. In recent years, wage rises have not kept pace with the significant increases in house prices and rents in the borough. Around 50 per cent of Newham's residents currently live in poverty when housing costs are taken into consideration, a situation that may worsen if cost of living increases continue along current trends. Furthermore, Government data shows that Newham has continuously had one of the largest housing registers in the

country as well as the largest number of people in temporary accommodation. The 2021 Census also showed that 25 per cent of households in Newham are living in over-crowded conditions, the highest level of overcrowding in London.

- 1.34. In his response to Newham's Regulation 19 consultation, the Mayor noted that setting the affordable housing threshold at 60 per cent would actually reduce the delivery of affordable homes in practice and would result in larger numbers of residential planning applications not being able to meet the threshold. While the delivery of affordable housing in London is a key priority for the Mayor, he considered that Newham's approach would mean more proposals following the Viability Tested Route (VTR), which undermines the threshold approach of the London Plan, takes longer to determine planning applications when compared with Fast Track Route (FTR) schemes, and overall has been shown to provide less affordable housing. It is noted, by the Mayor of London, that there is no indication that the current difficult economic context will be resolved in the short-term and the policy approach is not expressed in a way so that it only applies in circumstances when viability can support a 60 per cent affordable housing delivery on a sufficient proportion of sites to justify its inclusion in the plan. Further, by requiring an 83/17 split in favour of social rented housing, the Mayor of London is concerned that is likely to mean that relatively few residential applications will be able to meet these requirements, resulting in even more schemes having to take the Viability Tested Route. The approach is considered to remain unviable and undeliverable. The threshold approach would not operate in Newham as an incentive to housebuilding and affordable housing delivery, impacting negatively on both.
- 1.35. However, Newham consider the proposed target set out in Policy H3 to be positively prepared and justified. The target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by both our strategic housing market assessment and the fact that Newham has the highest number of residents in temporary accommodation in the country. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024, which will be a material consideration in planning decisions ahead of the adoption of the new Local Plan. While the viability assessment that supports the plan shows viability challenges in meeting this target, the testing was undertaken in a particularly challenging viability context, with construction costs and interest rates being abnormally high. We consider that as economic circumstances improve, the policy will become easier to deliver over the plan period. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the policy target, thereby ensuring the plan remains effective and deliverable. The policy's evidence base list also refers to the Affordable Housing and Viability Supplementary Planning Guidance, which provides further guidance on formulating review mechanisms.

Topic: Gypsy and Traveller need

- 1.36. In December 2023, the Government updated the Planning Policy for Traveller Sites (PPTS). The PPTS was further amended in December 2024 with the PPTS definitions updated in line with the October 2022 Court of Appeal ruling, which found the previous 2015 PPTS to be unlawful in its discrimination against those forced to give up their nomadic lifestyles due to disability or old age.

- 1.37. As part of our Local Plan evidence base Newham has prepared a Gypsy and Traveller Accommodation Assessment (2022), which found that there was no need for new pitches for households that met the 2015 Planning Policy for Traveller Sites definition of Gypsies and Travellers. However, the study found a need for 23 pitches for households that did not meet the Planning Policy for Traveller Sites definition at the time of the assessment, prior to the aforementioned ruling and change to the PPTS definition, but whose needs would need to be considered under the Housing Act 1985 and the Housing and Planning Act 2016.
- 1.38. The GLA is finalising work on the London-wide Gypsy and Traveller Accommodation Needs Assessment. However, no decision has yet been reached as to whether and how the GLA would also seek to direct delivery of identified need as part of the review of the London Plan and whether it would continue the existing approach of boroughs being required to meet their own need in line with the NPPF, using London Plan need figures. There are differences in the methodologies used in Newham's Gypsy and Traveller Accommodation Assessment and the GLA's emerging needs assessment; however, having been engaged on the methodology Newham are broadly supportive of the approach taken by the GLA, and will seek to reflect this figure in monitoring of the Draft Submission Local Plan's policy on Gypsy and Traveller Accommodation.
- 1.39. The Newham Draft Submission Local Plan allocates one site as a safeguarded Gypsy and Traveller accommodation site, which is an existing site containing 15 pitches. The safeguarding of this site does not count towards meeting identified future need, albeit there is scope to extend the site by two pitches to the south of the allocation to meet need.
- 1.40. In light of the above, and as advised by the GLA, Newham approached several boroughs, including all neighbouring boroughs and Havering, to understand whether there is any available Gypsy and Traveller pitch capacity which could assist Newham in meeting its need. However, none of the boroughs are in a position to support Newham's additional Gypsy and Traveller accommodation need, and this has been set out in the Duty to Cooperate Addendum (2025) and the Statements of Common Ground that have been signed with neighbouring boroughs.
- 1.41. To demonstrate that the plan is justified, the Council will make a minor modification to its monitoring framework, setting out a target of 23 pitches between 2022 and 2038, which will be monitored proportionately compared to need identified in the Gypsy and Traveller Accommodation Assessment and any emerging evidence prepared by the Greater London Authority.

Topic: Employment land demand (including and Land swap along Bidder Street SIL)

- 1.42. To meet Government's objective to build a strong, responsive and competitive economy, paragraphs 20 and 82 of the National Planning Policy Framework (NPPF) expects strategic policies to set out an overall strategy to make sufficient provision for employment and other commercial development, and requires boroughs to set out clear economic vision, set criteria or identify strategic sites to meet the anticipated needs over the plan period. The London Plan (2021) also sets out in Policy GG5 that planning and development are expected to plan for

sufficient employment and industrial space in the right locations to support economic development and regeneration.

- 1.43. London Plan Policy E4 ensures that there is a sufficient supply of land and premises across London to meet current and future demands for industrial uses and related functions. Policy E4 requires LPAs to retain, enhance and provide additional industrial capacity. This is to be monitored and managed. Policy E6 requires boroughs to designate and define Locally Significant Industrial Sites with range of acceptable use, as justified by evidence in local employment land reviews. Boroughs are required to protect and deliver the employment sites following the principle of intensification, co-location and substitution as set out in Policy E7 of the London Plan.
- 1.44. Employment land in Newham is designated through the existing and the future Local Plan as Strategic Industrial Locations which accommodate heavier industrial uses, warehouses and utilities; and Local Industrial Locations to house smaller scale, locally significant industrial areas. Co-location with residential and employment land uses is only allowed in specific Local Mixed Use Areas.
- 1.45. To review the suitability of the existing employment designations, Newham's Employment Land Review (ELR) was updated in July 2022. The findings in the ELR regarding employment land supply and demand in the borough as well as a land audit on each designated employment site were used to inform the emerging Local Plan.
- 1.46. Newham's Employment Land Review (2022) suggested that there is an opportunity towards the south of the SIL along Bidder Street, which is a cleared site, to be re-designated as a LMUA. This could improve the prospects for intensification and assist with improved place-making linked to the close by Canning Town district centre or station. In turn, new SIL land would be provided through re-designating the northern part of Bidder Street LMUA to SIL to help meet industrial need in the borough and enhance the integrity of the SIL as an industrial location. This amendment was taken forward as part of the Local Plan employment designations, as set out in the published topic paper [Proposed New Employment Land Designations and Boundary Amendments](#) (2024).
- 1.47. In their response to Newham's Regulation 19 consultation, the Mayor of London commented that the draft Plan uses the generic term 'employment uses', which they believe does not help make the necessary distinction between industrial, office and other commercial activities and their respective Use Classes. He recommended that the draft Plan should be amended accordingly so that the distinction is recognised, with priority given to the protection and promotion of Class B uses. Similarly, the Mayor for London considered that the land swap at Bidder Street would be acceptable, but should focus on accommodating Class B uses. During the meeting on 24th January 2025, the GLA clarified that a primary concern with the promotion of use Class E within employment designations is that they benefit from a wide flexibility, including permitted development rights to change use to residential.
- 1.48. In response to the Mayor of London's concerns, Newham Council worked with the consultants who produced the ELR to better understand the composition of uses on Newham's industrial land and the deliverability of removing class E uses from these designations. Data including the GLA's Industrial Land Supply Study 2023, the Council's completion data and a view derived

from Standard Industrial Classification (SIC) have been analysed, concluding that the share of light industrial activity in Newham is around 15% of the overall industrial demand, which is considered would not impact on the overall industrial supply in the borough. The full paper is set out in Appendix 3.

1.49. As such, while Newham Council agree with the GLA's objectives, Newham does not consider such significant changes to the Newham Local Plan to be appropriate within Newham's context. Further, the requested changes are not in keeping with London Plan Policies E4 - E7, which set out the range of industrial uses acceptable in Strategic Industrial Locations, Locally Significant Industrial Sites (equivalent to Local Industrial Locations in this Plan) and non-designated industrial sites. This includes Class B uses, as well as research and development floorspace (Class E(g)(ii)/B1b) and light industrial floorspace (Class E(g)(iii)/B1c), with no prioritisation over particular use classes in relevant policies. While it is noted that the "Use Class E" was introduced in the late phases of the London Plan examination process and has therefore not been reflected in its' policies, this is not a new type of land use which should not override the spatial approach in the London Plan. The London Plan actively encourages research and development and light industrial floorspace (which are now defined as Class E(g)(ii) and Class E(g)(iii)) within protected employment land in the same way as it does for Class B floorspace. As set out in Local Plan Policy J1, Class E(g) industrial floorspace is directed to both non-designated and designated employment sites including SILs and LILs, and all proposals within SILs or LILs for office E(g)(i) floorspace is required to be ancillary to the industrial function. As such, Newham Council's approach is considered in line with the approach in the London Plan to promote industrial supply.

1.50. The Council will continue to monitor the floorspace composition in its employment designations, including any impacts of permitted development rights. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E. To clarify this approach, the Council will make the following minor modifications.

Part of the Plan (para, imp reference, policy part) etc	Change proposed (new text in bold and any removed text in strike through)
J1.2 Implementation	All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy. Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location.

J3 Implementation, All	Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances: - the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or - the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified.
Monitoring Framework - Key performance indicator 22	Target no net loss of floorspace. Monitor for location against designated employment land and non-designated employment sites. Monitor approvals (gains and loss) and completions. Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site allocations and other non-designated employment sites.

- 1.51. In the Mayor of London's representations at Regulation 19, he welcomed the requirement in Policy J2 to deliver net increases in industrial floorspace on Newham's SILs and LILs, and recommended that it would be beneficial for the Plan to reflect the findings of the Employment Land Review (2022) that some sites have greater potential for industrial intensification over others. The intention should be to take a more proactive approach towards meeting the borough's industrial need.
- 1.52. Newham Council's objective is to optimise the industrial capacity in Newham to meet the borough's strong industrial needs as informed by the Employment Land Review 2022 through promoting no net loss of industrial capacity and delivering industrial intensification in all designated employment locations. The Council is already using a proactive approach on intensification, including:
- The change to the policy approach at Regulation 18 stage to introduce tall building zones in Strategic Industrial Locations to accommodate stacked industrial uses.
 - Working proactively with stakeholders to consider how intensification can be best delivered at its optimal capacity
- 1.53. In relation to the 10 sites identified under the Employment Land Review 2022 as having potential for intensification within the plan period, Canning Town Industrial Area is subject to

council-led regeneration framework, Grantham Road is subject to a planning permission, while Bow Goods Yard is subject to live application. All of these sites target to deliver industrial intensification within the proposals. The Council also notes positive feedback from developers during Regulation 18 and Regulation 19 consultations on the intensification approach on a number of sites. Most of these 10 sites are anticipated to be delivered from the medium term to end of the plan period. As there is still a high degree of uncertainty and risk in respect of the intensification sites, it is considered necessary that the Council should promote intensification of all designated employment locations to proactively meet the identified industrial needs in the borough. However, the Council will make the below minor modification to ensure the Plan is positively prepared, justified and effective:

Part of the Plan (justification, imp reference, policy part etc)	Change proposed (new text in bold and any removed text in strike through)
J1, Table 12 'Sites with potential for intensification'	Add footnote for 'Sites with potential for intensification' Including the 10 Strategic Industrial Locations/ Local Industrial Locations with potential for intensification in the plan period identified in Table 4.5 of the Employment Land Review (2022).
J1.2 implementation	To meet the industrial demand and enable employment growth, industrial development in both SILs and LILs have to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. Where Strategic Industrial Locations and Local Industrial Locations have been identified as sites with potential for intensification in the plan period under Table 4.5 of the Employment Land Review (2022), the Council will work proactively with site owners and industrial occupiers to explore the opportunities for optimisation of industrial capacity at these sites where appropriate. It is also acknowledged that some of these sites are owned by the Council, which provides additional opportunities for proactive planning for industrial intensification to achieve the objective of this policy.

Topic: Prioritisation of developer contributions towards public transport

- 1.54. London Plan Policy DF1 sets out how the London Plan will be delivered and planning obligations priorities. Part D of this policy set out that Local Plans should priorities affordable housing and necessary public transport improvements.
- 1.55. In their response to Newham's Reg. 19 consultation, the Mayor of London noted that Newham's planning obligations priorities set out in policy BFN4.3 – affordable and family

housing, local access to employment and training, and the delivery of required infrastructure – does not align with London Plan Policy DF1.D. This view is shared by Transport for London.

- 1.56. The Newham Local Plan approach to securing planning obligations is to provide the overarching approach through policy BFN4, with any further planning obligations required to deliver specific policies listed under the relevant policy (e.g. T1 for transport infrastructure). Additionally, site-specific clarity is provided through the site allocations' infrastructure requirements, which require the delivery of all types of infrastructure that have already been identified through the evidence base (e.g. the Sustainable Transport Strategy) and are relevant to the site. Where a piece of infrastructure is need to make a development acceptable, this will be required as a condition of approval. Where these are already known, these are already in the site allocations as infrastructure requirements. Beyond this, BFN4 policy priority applies, the implementation text of which provides some flexibilities.
- 1.57. Policy BFN4 of Newham's Submission Draft Local Plan sets out the borough's priorities with regards to securing developer contributions for infrastructure, and states as part of the implementation that: *Newham's policy priority is the provision of more social rent homes due to the needs of Newham residents for genuinely affordable, long-term, secure, rented accommodation. Where necessary to deliver the provision of infrastructure required as part of a site allocation, or where its provision is considered necessary by internal, regional or national consultees or partner bodies, an alternative prioritisation may be considered more appropriate and/or additional sources of funding to enable the delivery of the required infrastructure may, where possible, be identified by the Council. The Council will also support the exploration of additional sources of funding to enable the delivery of the required infrastructure.*
- 1.58. This prioritisation approach is also in Newham's adopted Local Plan (2018) and Newham do not consider there to be any examples where required transport infrastructure has not been delivered as a result of the existing policy. The flexibility for site-specific context to lead to changes in the prioritisation of contributions is reiterated in policy BFN4, and could be used where a piece of transport infrastructure is required for a site to come forward.

Topic: Tall buildings strategy and protected vistas

- 1.59. London Plan (2021) Policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet housing need.
- 1.60. Policy D9 part A, in particular, requires boroughs to identify in their development plan what is considered a tall building for their specific localities and Policy D9 part B requires boroughs to define the appropriate tall building heights. Implementation paragraph 3.9.2 further states that boroughs are expected to determine the maximum height that could be acceptable in these locations.
- 1.61. Policy D9 part C sets out a comprehensive list of criteria for tall buildings to meet – visual, functional, environmental and cumulative impacts to make sure that tall buildings play a positive role in shaping the character of an area.

- 1.62. In 2022 Newham published Newham Characterisation Study (2022) as an evidence base document to support the refresh of the Local Plan for Regulation 18 consultation. The document is a borough wide assessment developed in line with the guidance set out in the Characterisation and Growth Strategy LPG and includes a tall building assessment which replaces the Tall Building Study (2018). Following comments received at that stage, the Newham Characterisation Study has been amended (2024) and has been supplemented with the Tall Building Annex (2024), which support the tall buildings strategy set out in the Submission Draft Local Plan. This document summarises the sieving exercise that was undertaken to identify suitable locations for tall buildings based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets.
- 1.63. In their response to Newham's Reg. 19 consultation, the GLA noted that the term 'maximum' building heights' should be substituted for the term 'appropriate building heights', to allow for some practical flexibility, unless there are specific constraints to the maximum height of buildings, such as to prevent the development of tall buildings from obstructing one of London's strategic views, as set out in the London View Management Framework (LVMF), or where maximum building heights have been set by the Civil Aviation Authority. The GLA therefore prefer that Newham reflect the wording of Policy D9.B2, rather than the implementation wording.
- 1.64. The Council considers Policy D4 of the Newham Local Plan to be in conformity with the London Plan Policy D9, which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states "in these locations, determine the maximum height that could be acceptable", and this is the Council's preferred approach. The Council also considers that the methodology used to identify suitable locations and height for tall buildings, included in Newham Characterisation Study (2024) and Tall Building Annex (2024), complies with the Characterisation and Growth Strategy LPG. The range of building heights, illustrated on the policy map and in Table 1 of policy D4, has already taken into consideration the practical arrangements of taller and lower buildings within each Tall Building Zone. The proposed varying heights within the tall buildings zone allow for heights to transition from the tallest element to the surrounding context and sensitive areas, whether low-rise context or historic asset. Therefore, we consider that defining maximum heights, which are supported by a comprehensive evidence base and an evaluation that already addresses the design-led approach and optimisation considerations, meets the requirements of the London Plan and helps manage tall building developments at pre-application stage, giving a clear direction of expectations.
- 1.65. In their response to Newham's Reg. 19 consultation, the GLA also noted that there are two strategic London View Management Framework (LVMF) views that intersect with the borough, and these should be included in the borough's Policies Map and within the draft Plan in relation to tall buildings to provide clarity.
- 1.66. Newham have reviewed the spatial strategy and identified that there are no Tall Building Zones or site allocations within the background of the linear view 8A.1 Westminster Pier to St. Paul's Cathedral. Therefore, we don't consider it necessary to specifically reference the linear vista 8A.1 in the D4 Tall Building Policy. The Richmond to St Pauls 9A.1 protected vista is already referenced in TBZ19: Stratford Central and TBZ20: Chobham Manor / East Village, and

implementation text D4.3 adequately addresses the need to consider any visual impact on any of the LVMF views. However, the Council recognises the importance of ensuring the Plan is accurate and will therefore make a minor amendment to the Policies Map to add the protected vistas of Westminster Pier to St Paul's Cathedral 8A.1 and Richmond to St Pauls 9A.1 to the Policies Map.

Topic: Waste management capacity as part of site allocations

- 1.67. In their response to Newham's Regulation 19 consultation, the GLA noted that the intention of the Local Plan should be to protect and maintain the waste capacity of safeguarded waste facilities on sites at Silvertown Quays and Connaught Riverside site allocations, until at least the current review of the East London Waste Plan is completed.
- 1.68. These sites were discussed further as part of the meeting on 24th January 2025, where Newham Council clarified that:
- The waste facility on Silvertown Quays site allocation was released from its industrial use as part of the approved outline application for the site, in 2014, which predates London Plan Policy SI8. As the loss has already been consented, it is no longer possible to require the protection or re-provision of this facility.
 - The waste capacity of Connolly's Yard / Jighand Ltd. site on Connaught Riverside site allocation is adequately protected through the requirements of both the current and future Local Plan.
- 1.69. Since 2020, Newham have held regular meetings with the London Boroughs of Barking and Dagenham, Havering and Redbridge on updating the adopted 2012 East London Joint Waste Plan (JWP).
- 1.70. The Regulation 18 Joint East London Waste Plan was consulted on between 29th July and 16th September 2024, and outlines the waste sites within Newham (and the other partner boroughs) that will be safeguarded to meet the boroughs' apportionment target, as well as setting out how Newham will seek to manage other waste streams. The latest evidence, which has been refreshed as part of the preparation of the Regulation 18 draft Joint Waste Plan, concludes that East London has more than enough management capacity to meet the boroughs' apportionment target.
- 1.71. Some changes have been made to the draft East London Waste Plan as a result of the Regulation 18 consultation, including suggested changes to the list of safeguarded sites. Although discussions with London boroughs and the GLA continue regarding capacity sharing, a programme of work on the Regulation 19 East London Waste Plan has progressed and this has been published for consultation between 19th May 2025 and 30th June 2025.
- 1.72. Newham have received the GLA's consultation response for the Regulation 19 draft East London Waste Plan and are considering the response together with the other waste-planning boroughs ahead of submission of the plan to the Planning Inspectorate. Newham and GLA will continue to proactively engage on this process.

Topic: Newham's Metropolitan Open Land review

- 1.73. London Plan (2021) Policy G3 Metropolitan Open Land sets out that Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt. Policy G3 requires boroughs to work with partners to enhance the quality and range of uses of MOL. The policy sets out that any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.
- 1.74. London Green Belt can be thought of as a permanent area of open land that surrounds the city, whereas MOL relates to strategically significant open spaces within the built environment of London.
- 1.75. In 2022/23 Jon Sheaff and Associates, now known as Arkwood, and London Wildlife Trust, undertook an initial review of Newham's Metropolitan Open Land to regularise the existing designations, understand if there were any omissions and to ensure that the existing designations met the criteria of the NPPF and London Plan. This work was revised and updated in 2024 and Newham's Metropolitan Open Land Review (2024) was published as evidence during Newham's Regulation 19 Consultation.
- 1.76. In line with the London Plan (2021) Policy G3, all neighbouring boroughs and the Mayor of London have been consulted throughout the process of preparing, publishing and reviewing and Newham's Metropolitan Open Land Review, and this has been set out in the Duty to Cooperate Addendum (2025) and the Statements of Common Ground that have been signed with neighbouring boroughs.

Appendix 3 – Advice Note: Disaggregating economic need in Newham, Rapleys (February 2025)

Disaggregating economic need in Newham

Introduction

The Borough's economic evidence – Employment Land Review July 2022 identifies demand for 335,000 sq m of new industrial space (or in land terms 52 ha) over the 2021-38 plan period.

The evidence base splits demand between industrial and warehouse formats, but presents a single combined 'industrial' requirement – in line with market evidence and feedback. This suggests that, in the Newham context, there is little to differentiate the two markets and developers are best placed to specify the exact format of their future property. It is the case that, in a modern market, the physical characteristics of a B2 site/property are very similar to a modern B8 unit, and it is not uncommon for units to change use over time.

The GLA has sought further detail on the split of industrial demand – between warehousing and industrial uses and a further split of industrial uses between E and B class demand.

Appended to this note is further disaggregation of Table 5.13 of the Evidence Base which presents the calculation of need fully disaggregated between Industrial and Warehousing demand.

In the rest of this note we discuss the more detailed request from the GLA regarding the split between E class and B class industrial demand.

Collectively the boroughs and the GLA, have failed to stem the loss of industrial property in London and the 'benchmark' quantum of land releases envisaged by the London Plan have been grossly exceeded. So, the potential to direct the future provision of light industrial activities towards town centres and other locations, and 'free up' industrial estates for B2/B8 activity is something that, for good reason, the GLA are keen to explore.

E Class Industrial

Planning use class E(g)(iii) refers to property suitable for any process that can be carried out in residential areas without detriment to the amenity of that area by noise, vibration, smell, fumes, smoke, soot, ash, dust or grit. It was formally, prior to a re-cast of the Use Class Order, described as 'light industrial' or B1c.

This split is rarely presented in economic evidence because the size of the genuine E class (industrial) market is small and overlaps with more traditional office space. Pragmatically, where the industrial activity is light enough that it can be undertaken in a residential environment this demand overlaps with office space or, more recently, distressed retail space.

It is also the case that the vast majority of 'light industrial' stock is located on the protected estates, and it cannot be inferred from an analysis of the existing stock of property, or firms, who can (and would like) to operate from property with residential restrictions. From a commercial perspective demand for E class industrial space is not of a quality that can easily be re-located away from the established estates as a matter of principle - regardless of the legality of E vs B class. Light Industrial (and workshop space) is often used by the market simply to describe a small industrial property.

It is also unclear to what extent the small unit industrial stock in Newham would, if tested, meet the conditions to be E class as opposed to B. The residential restriction would rarely be relevant to most of the stock given where it is located.

How significant is Industrial E class in Newham?

Noting these concerns - we have looked to identify the scale of E(g)(iii) class activity in Newham in three ways. From the GLA evidence base, the Borough's completion data and a view derived from Standard Industrial Classification (SIC).

i) **GLA View – Industrial Land Supply Study 2023 (GLA/AECOM)**

Firstly, looking at the stock of employment land in Newham – the GLA audited London's industrial land as part of the most recent industrial baseline, which was 2020 data.

For Newham this estimated that 6.5% of the Borough's industrial land (all industrial including warehousing) was 'light industrial'¹. This would appear broadly in line with London as a whole, with the study identifying only 213 ha of 'light industrial' land from a total stock of 4,255 ha for 'core industrial' - thus just 5% of all industrial land is light industrial.

¹ Page 27, London Industrial Land Supply Study 2020, Appendix A: Quantity of Industrial Land in London (March 2023)

Our view is that this suite of evidence may under-estimate E class floorspace because the analysis categorises whole estates/cluster as 'light' or not. This omits the fact that most of Newham Borough's estates are mixed and the approach to classifying whole clusters undercounts the smaller units which are more likely to be E class.

It is however a useful indicator, confirming that there is no large reservoir of E class industrial land in London, and with only 5% of London industrial land classed as light industrial, substitution of E class space away from protected sites would be unlikely to deliver a significant uplift in traditional industrial supply/capacity.

ii) Newham's recent delivery

Drawing on the Plan Monitoring employment uses completions data used to drive the ELR past trend analysis, we have established that no more than 20% of the last 10 years gross delivery has been E class industrial versus B2 or B8. In the last 5 years this share has fallen to 12%.

Past trends - gross gains	E(g)iii	B2	B8
Period - 2010/12-20/21			
All industrial (incl whse) (sq m)	12,113	27,957	24,143
Share	19%	44%	38%
Period - 2016/17-20/21			
All industrial (incl whse) (sq m)	6,428	23,204	22,544
Share	12%	44%	43%

Source: LB Newham Plan monitoring data and Rapleys analysis

This analysis uses gross change rather than net, because net change has been influenced by PDR losses. These losses are unrelated to (economic) market demand with even occupied/lettable space being lost.

This approach suggests a higher share than the GLA land supply evidence, but as noted we think the GLA approach may have omitted some E class property.

iii) SIC / Activity

Thirdly, we have looked to refine our use of SIC codes to 'fillet' those activities that could be accommodated in E class space.

While there is a general consensus across evidence bases regarding SIC to industrial (and warehouse) mapping there is no consensus regarding E class industrial SICs. Few studies make this distinction because most agree with the market evidence that the space is interchangeable.

Further, many sector based evidence studies, for example the extensive Creative Industry evidence do not provide recommendations related to the Use Class. Instead focusing on flexibility and (often) cost/ unaffordability of space. For example, the 2021 West London Affordable Workspace study presents a deep understanding of the wide range of industrial formats that could meet demand but as regards Use Class caveats its analysis and concludes that:

"it is difficult to provide, with any accuracy, particular space and technical specifications for activities encompassed by sector or use class. We have therefore provided considerations to consider; and a case study and business example approach to provide some steering on spatial and technical considerations."

Recognizing these limitations we have tried to use the Business Register and Employment Survey (BRES) 5 digit SIC data/codes (the most detailed available) for 2020 to estimate the size of the 'light' from wider Industrial sector here.

There is no agreed SIC split in evidence base, and as noted, most studies don't make this split. So, we have needed to assume that:

- A) Most Manufacturing is B2 – except textiles and IT related which in Newham we expect to be in workshop space.
 - a. So generally, 'Manufacturing of XXXX product' takes place in a B2 unit
- B) Repair activity can be undertaken in workshops (E).
 - a. So generally, 'Repair of XXXX product' takes place in a light industrial unit.
- C) The 'trades' (mainly building repair, plumbers, painters contractors) can occupy light space because they don't generally generate noise or dust etc.
 - a. So, we assume that most trades generate a demand for light industrial space (E)

Following this logic overall we have found only 1,700 possible E class industrial jobs which is only 12% of all industrial sector employment. Of these 1,700 jobs the vast majority (>1,000) are related to the trades.

Translating ‘trades’ into floorspace is notoriously complex – it is generally accepted ‘trades’ generate a demand for industrial space but, because most activity is ‘on site’, the use of standard employment densities is problematic. This is not a significant issue when the evidence base considers ‘industrial’ as a whole, because SIC to space mapping works for the vast majority of industrial sectors and the 1,000 or so ‘trade’ jobs are not significant.

But, when looking to finely ‘fillet’ the market (5% of London’s industrial stock is light) these anomalies become more important. Here we have assumed the trades occupy E class floorspace, but in practice many of these jobs will be ‘on-site’. So we can be confident that the trades generate a demand for light industrial property but there is no evidence confirming how many of these jobs demand physical space. There is a very large margin for error in this assumption.

Jobs in Newham	E(g)iii	B2	B8
Job numbers (2020)	1,715	7,220	5,765
All ind (incl whse) (%)	12%	49%	39%

Source: 2020 BRES data and Rapleys analysis

Thus, in 2020 the proportion of jobs in light industrial activities, accepting the caveats referred to above) stood at 12%.

Advice

The GLA are looking at how to boost the supply of industrial space across London. Boosting the supply of designated land is unlikely, so it follows, that to make the best use of the designated land those activities that do not need the characteristics of the designated estates could be accommodated elsewhere. This is notwithstanding the fact E class space is actively encouraged within protected employment land via London Plan policy.

We have looked to the evidence base to refine our assessment of industrial demand – looking to fillet the share of industrial land demand that could be located elsewhere. We have considered a number of sources, each with major caveats and limitations, combined we consider that around 15% of the Borough’s industrial activity could be considered ‘light’ – lacking obvious noise, dust or other amenity issues.

The largest grouping of these light activities are related to the trades – these may not ‘manufacture’ or generate dust, but they generally operate small light industrial style units with a need to store and service light goods vehicles. In London some may operate a retail element and there are examples where trade counter uses have been accommodated on the ground floor of development schemes, with homes above.

For the Plan and its approach to meeting industrial land needs E class demand is already accommodated on the established estates, and there is no clear evidence that they can be re-located, and their needs addressed elsewhere.

For future policy it would not be safe to assume that 15% of future industrial demand could be met via E class provision away from the established estates.

However; policy should look to encourage workspace provision where possible because, as the GLA note, London is chronically short of industrial land. If there is scope to move trade related activity into new locations and/or retail space this should be encouraged – but, in terms of addressing need, this should not be relied on because the evidence suggests that the majority of light demand still favours and benefits from residential separation.

While the data would not support a policy thrust to re-direct c15% of the industrial need away from the established estates. it may be useful to consider the 15% as a monitoring indicator.

As a monitoring indicator it demonstrates E class is always the minor component of Newham’s industrial land stock and future demand. As a general principle, E class space should not be accepted in lieu of B class space and in a scenario where there is a choice of designing new space then promoting E class space -with a built-in limitation as to how it can be used - is less preferable than securing B class space. Industrial space promoted as residential compatible E class will only appeal to a small element of Newham’s industrial economy.

Any circumstance whereby a developer claims that more traditional formats of light industrial space can be substituted for E class space needs careful testing. Whether or not the activity can take place in a residential environment is only one factor the market considers when looking for space.

APPENDIX

Revised ELR Table 5.13

	Core industrial	Ware-housing	Total Industrial
a Jobs change (2021-38)	3,753	1,397	5,150
b Density factor (sq m GIA /job)	45	67	
c Occupier demand (sq m GIA) [a*b]	168,970	92,899	261,869
d Vacancy factor (sq m GIA) [c*8.1%]	13,687	7,525	21,211
e Total occupier demand (sq m GIA) [c+d]	182,656	100,424	283,080
f Stock vacancy adjustment (sq m GIA)	10,480	14,492	24,972
g Net demand (sq m GIA) [e+f]	193,136	114,916	308,052
h Net demand (hectare) [g @65% plot ratio]	29.7	17.7	47.4

Nb the revision is made to the existing stock vacancy adjustment (row f) that splits the overall adjustment between core industrial and warehousing on the basis of the ratio of land in these uses according to the GLA/Aecom Industrial Land Supply study.

Activity and Jobs split based on SICs

Sum of 2020	Jobs in Newham		
SIC code	E	B2	Total
10110 : Processing and preserving of meat		10	10
10130 : Production of meat and poultry meat products		20	20
10390 : Other processing and preserving of fruit and vegetables		10	10
10519 : Manufacture of milk products (other than liquid milk and cream, butter, cheese) nec		10	10
10520 : Manufacture of ice cream		10	10
10612 : Manufacture of breakfast cereals and cereals-based foods		10	10
10710 : Manufacture of bread; manufacture of fresh pastry goods and cakes		300	300
10810 : Manufacture of sugar		800	800
10822 : Manufacture of sugar confectionery		300	300
10850 : Manufacture of prepared meals and dishes	20		20
10890 : Manufacture of other food products nec		1,000	1,000
11070 : Manufacture of soft drinks; production of mineral waters and other bottled waters		200	200
13300 : Finishing of textiles		5	5
13921 : Manufacture of soft furnishings	5		5
14120 : Manufacture of workwear	10		10
14131 : Manufacture of men's outerwear, other than leather clothes and workwear	10		10
14132 : Manufacture of women's outerwear, other than leather clothes and workwear	30		30
14190 : Manufacture of other wearing apparel and accessories	75		75
16230 : Manufacture of other builders' carpentry and joinery		35	35

17219 : Manufacture of paper and paperboard containers other than sacks and bags		10	10
18129 : Printing (other than printing of newspapers and printing on labels and tags) nec		225	225
18130 : Pre-press and pre-media services	35		35
18140 : Binding and related services	20		20
20160 : Manufacture of plastics in primary forms		30	30
20420 : Manufacture of perfumes and toilet preparations		10	10
22190 : Manufacture of other rubber products		10	10
22210 : Manufacture of plastic plates, sheets, tubes and profiles		10	10
22220 : Manufacture of plastic packing goods		10	10
22290 : Manufacture of other plastic products		5	5
23610 : Manufacture of concrete products for construction purposes		5	5
23630 : Manufacture of ready-mixed concrete		25	25
25110 : Manufacture of metal structures and parts of structures		30	30
25120 : Manufacture of doors and windows of metal		25	25
25500 : Forging, pressing, stamping and roll-forming of metal; powder metallurgy		40	40
25620 : Machining		50	50
25720 : Manufacture of locks and hinges		10	10
25910 : Manufacture of steel drums and similar containers		10	10
25990 : Manufacture of other fabricated metal products nec		10	10
26110 : Manufacture of electronic components	10		10
26301 : Manufacture of telegraph and telephone apparatus and equipment		5	5
26511 : Manufacture of electronic instruments and appliances for measuring, testing, and navigation, except industrial process control equipment		300	300
26701 : Manufacture of optical precision instruments		10	10
28230 : Manufacture of office machinery and equipment (except computers and peripheral equipment)		50	50
28250 : Manufacture of non-domestic cooling and ventilation equipment		5	5
28302 : Manufacture of agricultural and forestry machinery (other than agricultural tractors)		300	300
28990 : Manufacture of other special-purpose machinery nec		30	30
29320 : Manufacture of other parts and accessories for motor vehicles		5	5
30200 : Manufacture of railway locomotives and rolling stock		50	50
31010 : Manufacture of office and shop furniture		200	200
31020 : Manufacture of kitchen furniture		25	25
31090 : Manufacture of other furniture		5	5
32130 : Manufacture of imitation jewellery and related articles	10		10
32300 : Manufacture of sports goods	10		10
32500 : Manufacture of medical and dental instruments and supplies	5		5
32990 : Other manufacturing nec		5	5
33120 : Repair of machinery		150	150
33140 : Repair of electrical equipment	20		20
33170 : Repair and maintenance of other transport equipment		75	75
33190 : Repair of other equipment		10	10
37000 : Sewerage		200	200

38110 : Collection of non-hazardous waste		350	350
38120 : Collection of hazardous waste		10	10
38210 : Treatment and disposal of non-hazardous waste		10	10
38320 : Recovery of sorted materials		700	700
43210 : Electrical installation	500		500
43220 : Plumbing, heat and air-conditioning installation		350	350
43290 : Other construction installation		100	100
43310 : Plastering		75	75
43320 : Joinery installation		125	125
43330 : Floor and wall covering	45		45
43341 : Painting	100		100
43342 : Glazing	25		25
43390 : Other building completion and finishing	350		350
43910 : Roofing activities	50		50
43991 : Scaffold erection	15		15
43999 : Specialised construction activities (other than scaffold erection) nec		400	400
45200 : Maintenance and repair of motor vehicles		450	450
45400 : Sale, maintenance and repair of motorcycles and related parts and accessories	5		5
95110 : Repair of computers and peripheral equipment	50		50
95120 : Repair of communication equipment	200		200
95210 : Repair of consumer electronics	30		30
95220 : Repair of household appliances and home and garden equipment	35		35
95230 : Repair of footwear and leather goods	20		20
95240 : Repair of furniture and home furnishings	20		20
95250 : Repair of watches, clocks and jewellery	10		10
Total	1,715	7,220	8,935