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## **R22 Local Plan**

### **Matter 5: Housing Land Supply**

## **Newham Local Plan**

St William Homes LLP

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27<sup>TH</sup> NOVEMBER 2025

Q253076

# Matter 5: Housing Land Supply

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- 1.1 On behalf of St William Homes LLP ('St William'), Quod submits this hearing statement in respect of Matter 5 Housing Land Supply. This hearing statement responds to IN3 'Inspector's matters, issues and questions, written statements; and hearings programme issued by the Inspector on 9th October 2025.

## Housing supply for the plan period 2023 to 2038

*Q5.1 Does the Plan need to be modified to clarify the contributions from different sources of land supply that are expected to meet the housing requirement (irrespective of what the figures for each of those sources are)?*

- 1.2 The Council's Site Allocation and Housing Trajectory Methodology (EB058) states at Table 5 the types of sites included in their submission trajectory: sites with planning permission; sites with resolution to grant<sup>1</sup>; site allocations without permission or resolution to grant; lapsed permissions; small sites; SHLAA 2017/Windfall sites. This is consistent with the Framework<sup>1</sup> which indicates planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 1.3 The Council disaggregates the total forecast of 54,976 homes<sup>2</sup> into site allocations (38,626), small sites (5,746), windfall sites (3,331) and other sources (7,273). Draft Policy H1(1) confirms that the bulk of delivery will be through site allocations, supported by small sites and windfall. This is consistent with the Council's response to Matter 2 (EWS004) noting that "the bulk of housing delivery is set to be delivered on large-scale, complex site allocations, many of which require the delivery of supporting infrastructure and a range of land uses". This is consistent with paragraph 77 of the Framework which notes that the supply of homes can often be best achieved through planning for larger scale development.
- 1.4 The Council's Housing Trajectory (EOD002) informed by EB058 provides a site-by-site phasing schedule as currently drafted up to 2038. The Council has since issued on 26th November 2025 their Local Plan Housing Land Supply Proformas (ED008) and their 5 year housing land supply SPQ30.2 (ED009). This provides up to date data for site allocations in the plan and the sources of site capacity figures explaining that design-led capacity testing has been superseded by planning permissions for different capacity figures.
- 1.5 For St William's and the Berkeley Capital's development sites it assumes the figures outlined in Table 1. Table 1 confirms that the site capacity assumptions align with the housing approved capacities:

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<sup>1</sup> Framework Paragraph 72

<sup>2</sup> Council's response to PQ25 (ED001) - derived from EB058 calculations

Table 1: 5 year housing land supply data comparison against extant planning permission for St William and Berkeley Capital sites

Scheme	Newham 5 Year Total	27/28	28/29	29/30	30/31	31/32	Consented Units
<b>Rick Roberts Way</b> (N8.SA7)	247	123	124	0	0	0	245 units
<b>Bromley by Bow</b> (N7.SA2)	610	122	122	122	122	122	c. 2,200 units
<b>TwelveTrees Park</b> (N7.SA2)	1,195	239	239	239	239	239	c. 4,700 units
<b>Beckton Gasworks</b> (N17.SA1)	606	0	0	202	202	202	c. 3,000 units

- 1.6 The Council confirm that it is these trajectory figures that inform the plan's housing target.
- 1.7 Whilst it is not explicitly required for the Plan itself to provide a breakdown of contributions from each source of supply, paragraph 72 of the Framework clearly expects trajectory and supply assumptions to be based on robust evidence<sup>3</sup> that they are indeed suitable and deliverable. We consider this has been met in part through the publication of up to date housing trajectory information which aligns with existing planning permissions where relevant however for those sites without planning permission we remain concerned with the design-led capacity testing approach used to inform their indicative capacities. Those sites with planning permission highlight the significant gap between the assumptions made through the design-led capacity testing approach and what has and can be achieved through design led development. It indicates that the site capacity assumptions are too cautious and unlikely to accurately reflect the quantum of development that could come forward on these sites.

## Site Allocations

*Q5.2 If the plan period were to be extended to 2042, which of the site allocations would have increased total capacity as a result of development continuing after 2038?*

- 1.8 The Council has now confirmed in their Hearing Statement to Matter 2 (EWS004) and in their resultant proposed modifications for Preliminary Questions and Matters 1 to 4 (ED006) issued on 21<sup>st</sup> November 2025 that the Plan period will be extended to 2042. This is in order to comply with Paragraph 22 of the Framework and ensure that the Local Plan period runs for at least 15 years from adoption.
- 1.9 As indicated by the Inspector, further information is required to determine if certain site allocations would have an increased total capacity if the plan period extends to 2042. The Current Housing Trajectory (EOD002) published on 30<sup>th</sup> September 2025 only extends to 2038. Therefore, at this stage the Council has not provided housing trajectory information for

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<sup>3</sup> Framework Paragraph 35

their renewed plan period, or confirmed which site allocations would generate additional capacity to 2042. This is inconsistent with Framework.<sup>4</sup>

1.10 It is noted that the Council states within their Housing Trajectory (EB058) that “*Newham also has additional potential sources of future supply from potential site allocations that were discounted from capacity testing given the lack of certainty around delivery within the Submission Local Plan period*”<sup>5</sup>. With the Council’s intention to extend the plan period to 2042, these sites should be considered and included to ensure the Council meets the requirements of the Framework. Paragraph 78 of the Framework states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. Without a phased trajectory for the entire 15-year plan period, the Council cannot show the Plan provides sufficient land for development, that identified supply is realistic, or if there is further developable capacity up to 2042. The Council are consequently unable to demonstrate that Policy H1 is underpinned by relevant and up-to-date evidence<sup>6</sup>. Proposed tracked changes are outlined in **Appendix 1**.

1.11 A number of Berkeley Group’s development sites within strategic allocations will continue to deliver homes beyond 2038, in particular the following three strategic sites:

- **TwelveTrees Park** – benefits from planning permission for c. 4,700 homes, which will be delivered by 2042. It is anticipated that approximately 1,000 of these homes will come forward toward the end of the plan period (subject to unit mix and phasing which will be subject to future RMA’s and detailed design).
- **Bromley by Bow** – benefits from planning permission for c. 2,200 homes, which will be delivered by 2048. It is anticipated that approximately 550 of these homes will come forward toward the end of the plan period (subject to unit mix and phasing which will be subject to future RMA’s and detailed design).
- **Beckton Riverside Phase 1** – benefits from resolution to grant for c. 3,000 homes, which will be delivered by 2063. It is anticipated that an additional 500 of these homes will come forward toward the end of the plan period (subject to unit mix and phasing which will be subject to future RMA’s and detailed design).

1.12 There may be further opportunity for additional housing delivery beyond 2038 should any of these developments sites be subject to further optimisation. The housing trajectory should be aspirational in line with the Framework<sup>7</sup>.

1.13 The Council must therefore update their evidence base to ensure the assumptions made around site capacities, projected delivery and build-out periods are accurate and up to date and take into account delivery up to 2042 in line with the extended plan period. Without this information the plan is not able to demonstrate that it is justified, effective or consistent with national policy, and so cannot satisfy the tests of soundness in NPPF paragraph 35.

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<sup>4</sup> Framework Paragraph 78

<sup>5</sup> EB058 – Paragraph 4.9.5

<sup>6</sup> Framework Paragraph 32

<sup>7</sup> Framework Paragraph 16

*Q5.3 Does the Plan need to be modified to include indicative capacities (numbers of homes) for each site allocation, along with an explanation of how they have been calculated and that they are subject to detailed design through masterplanning and planning application processes?*

- 1.14 The Council's response to PQ24(b) (ED001) states that they consider the exact scale of housing development which will come forward on each site allocation will depend on further detailed design work undertaken through the application process. This is consistent with London Plan Policy D3.
- 1.15 There is no requirement in the NPPF for Local Plans to specify indicative or fixed capacities for each allocated site. The NPPF requires authorities to identify a sufficient supply and mix of sites<sup>8</sup> that are deliverable and developable within the plan period<sup>9</sup>, but it does not mandate that capacities be assigned to individual allocations.
- 1.16 Given the Council has already produced a Housing Trajectory (EB058), we agree with the Council that it is not necessary to embed fixed site-level capacities within the Plan. Doing so would reduce flexibility and inhibit genuine design led optimisation of sites, which would be contrary to London Plan Policy D3. Furthermore, whilst the site capacity assumptions have now been updated to reflect of up to date evidence and planning permissions granted sites are also capable of further optimisation. Inclusion of site capacities within site allocations has the potential to hinder growth and optimisation rather than encourage. Final development capacity must be determined through detailed design work via the planning application process.

### **Sites with planning permission or resolution to grant for residential development**

*Q5.6 Are the assumptions in the Plan about the contribution from sites with planning permission, or a resolution to grant permission, to meeting the housing requirement over the plan period justified? In particular, should a lapse rate be applied?*

- 1.17 Following the publication of 5 year housing land supply data on 26<sup>th</sup> November 2025, the assumptions around the contribution from sites with planning permission, or resolution to grant have now been updated and rectified and are therefore considered justified as they are based on up to date evidence. However, the assumptions made around sites without planning permission which are subject to the design-led capacity testing are not justified. The updated capacity information published for sites with planning have highlighted the significant disparity between capacity assumptions and what is actually deliverable on sites.
- 1.18 EB058 confirms that sites with lapsed permissions are considered 'developable' and have been moved out of the Council's 5YHLS period into the medium and long-term phase accordingly.
- 1.19 Appendix 2 of the Framework confirms that sites are deemed to be deliverable until planning permission expires, unless there is clear evidence that homes will not be delivered within five years. The starting position is to therefore include these sites unless specific evidence

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<sup>8</sup> Framework Paragraph 61

<sup>9</sup> Framework Paragraph 72

indicates non-delivery within the 5YHLS period. The assumptions made by the Council within EB058 are therefore in line with the Framework.

- 1.20 With regards to the application of a lapse rate, it is not a requirement of the NPPF and PPG for Council's to apply a lapse rate however a lapse rate can be applied as a matter of local judgment based on historical evidence of permissions not coming forward, sites can also be removed or discounted upon identifying evidence that they will not be implemented. Both approaches are compatible with national guidance provided that they are justified and applied consistently across all sites with permission or resolution to grant. The key is that the Plan is prepared in line with the PPG which states that "robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions" in line with definitions of 'deliverable' in Annex 2 of the Framework.

*Q5.7 If the plan period were to be extended to 2042, which, if any, of the sites with planning permission or resolution to grant would have increased total capacity as a result of development continuing after 2038?*

- 1.21 Please refer to our response to question 5.2.
- 1.22 These are all multi-phase, long-term strategic schemes. In each case, the infrastructure requirements, phasing complexity and scale of development strongly indicate a delivery profile extending well beyond 2038.
- 1.23 Therefore, several of the Council's consented or resolved-to-grant sites would almost certainly yield additional homes between 2038 and 2042. The Council must therefore provide an updated, site-specific phased trajectory extending to 2042 to confirm the level of additional capacity within the plan period.

**Appendix 1 – Policy H1 Tracked Changes**

## H1: Meeting housing needs

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 20**~~42~~38**. 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
  - c. supporting residential developments that come forward on windfall sites (unallocated or undesignated land) unless other policies within the Local Plan direct otherwise.
2. Developments delivering residential units should optimise site capacity through a design-led approach, as set out in Local Plan Policy D3 and London Plan 2021 Policy D3, taking into account the site's context, capacity for growth and existing and planned supporting infrastructure capacity.
3. Sites Allocations or sites with a recent consent for general needs housing or part-residential development should be developed at least in part for general needs housing.
4. Developments that seek to deliver community-led housing, self-build or custom build housing will be supported in principle where they optimise site capacity through a design-led approach.

### Justification

Newham has a significant strategic role to play in delivering new homes to meet both the borough's and London's wider need for housing. 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. This range target is capacity-derived, based on: approved planning permission figures; design-led capacity testing of site allocations; capacity assumptions from the Greater London Authority's 2017 Strategic Housing Land Availability Assessment; and capacity assumptions from lapsed application sites. Newham has also taken forward the housing capacity assumptions on small sites set out in the London Plan. The higher growth figures are dependent on significant infrastructure projects unlocking development sites. Supply will be measured through a stepped trajectory, with a different target for every five year phase of the Plan, as follows:

Delivery Period	Years	Annual Delivery Target
Short term	2023/24 – 2027/28	<del>2,974</del> <b>2,957</b>
Medium term	2028/29 – 2032/33	<del>3,836</del> <b>3,966</b>
Long term	2033/34 – 2037/38	<del>3,475</del> <b>3,716</b>

The stepped trajectory shows a significant amount of Newham's housing target will be delivered in the medium to long term phase of the plan. This is because a large proportion of housing delivery numbers will be on large, complex site allocations, many of which require associated infrastructure delivery to facilitate high density housing development. We have assumed a relatively conservative delivery timescale for these developments, as set out in further detail in the 'Site allocation and housing trajectory methodology note' that supports the plan. However, it is acknowledged that many of these sites may be delivered more quickly than this delivery rate suggests. Indeed, a



number of the largest of the borough's site allocations are located on land owned by the Greater London Authority, with many of these sites anticipated to be subject to strategic level investment to optimise housing delivery aligned with London's housing needs.

In order to meet the borough's ambitious housing target, developments will need to optimise the delivery of homes on site allocations, small sites and other large windfall sites using the design-led approach set out in both local and regional policy. Applicants will need to ensure that housing has access to adequate supporting infrastructure, such as public transport, healthcare, education and utilities, as well as local facilities such as retail, social infrastructure, open spaces and parks. Innovative methods of housing delivery, such as self-build, custom housebuilding and community-led housing developments will also be supported where these make optimal use of a site.

## Implementation

H1.1	<p>H1.1 sets out Newham's housing target and sites where the principle of delivering new homes will be supported. The majority of new housing development delivered over the plan period will be on site allocations. More information on site allocations can be found within the Neighbourhoods <del>chapter</del> <b>section</b> of the Local Plan.</p> <p>Outside of designations (including but not limited to Strategic Industrial Land, Local Industrial Land, Metropolitan Open Land and Green Belt) or land uses with policy protections (for example, ground floor commercial, business and service uses in primary shopping areas, green spaces or social infrastructure) delivery of housing will be supported in principle.</p> <p>Small sites will form a part of Newham's housing delivery. Developments should seek to optimise housing delivery on small sites below 0.25 hectares in size, following the design-led approach and using the small sites typologies set out in the Newham Characterisation Study (2024). Over the course of the Plan period, Newham will aim to deliver 3,800 homes on sites of this scale, as set out in Policy H2 of the London Plan 2021.</p>
H1.2	<p>Expectations for following the design-led approach are set out in policies D3 of the Local Plan and D3 of the London Plan 2021. In some circumstances, certain uses or buildings within a site boundary will need to be protected or re-provided. In these cases, applicants should consider relevant policy requirements set out within the Design, High Streets, Social Infrastructure, Inclusive Economy, Green and Water Spaces, Transport and Waste and Utilities chapters of the Local Plan. Where a development falls within a site allocation (see Neighbourhoods <del>chapter</del> <b>section</b>), infrastructure requirements and development principles set out what infrastructure and uses need to be provided within a site. Applicants should also consider the requirements of Policy BFN4, which seeks to ensure that developments contribute to delivering necessary infrastructure where needed.</p> <p>Applicants for new housing developments should set out through supporting documents how housing densities respond to local context and character (using the guidance and analysis set out in the Newham Characterisation Study (2024)), environmental constraints and are appropriate in relation to the availability of supporting infrastructure including open space, transport, retail, social infrastructure, health, utilities and other supporting facilities.</p> <p>A development containing housing will not be supported if a proposal fails to optimise the housing delivery potential of the site in line with the design-led approach and relevant policies of the development plan.</p>

H1.3	Developments on sites with a recent consent for general needs housing or part-housing development are expected to propose general needs housing as part of their submission. Where a development looks to deliver specialist housing in place of a previous consent for general needs housing, robust evidence should be supplied as to both the need for the proposed specialist housing (in accordance with the requirements of Policy H6) and why the loss of the permitted general needs housing would not compromise Newham's ability to meet its most pressing housing needs, including for three-bedroom homes and genuinely affordable housing. Assessments of such proposals should take into consideration the Council's latest Strategic Housing Market Assessment.
H1.4	Developments delivering community-led housing, self-build or custom build housing will be supported in principle where they are considered to optimise the capacity of housing delivery on a site. These developments will be assessed in accordance with the requirements of the design-led approach, as set out in policies D3 of the Local Plan and D3 of the London Plan 2021. They are also expected to meet the requirements of policies H3 and H4, alongside other relevant requirements of Local Plan policies.

#### Evidence base

- Newham Strategic Housing Market Assessment, Opinion Research Services (2022)
- Characterisation Study, Maccreeanor Lavington with New Practice, Avison Young and GHPA (2024)
- Site Allocation and Housing Trajectory Methodology, LB Newham (2024)

#### Policy links

##### Local Plan:

- BFN4: Developer contributions
- H2: Protecting and improving existing housing
- H3: Affordable housing
- H4: Housing mix
- D3: Design-led residential site capacity optimisation
- Section 4: Neighbourhoods

##### London Plan 2021:

- D3 Optimising site capacity through the design-led approach
- H1 Increasing housing supply
- H2 Small Sites
- H4 Delivering affordable housing