



# **Newham Local Plan Examination**

## **Matter 6: Housing development management policies**

**Hearing Statement**  
**November 2025**

## **1. Introduction**

- 1.1 This Hearing Statement has been prepared by the London Legacy Development Corporation (LLDC) to respond to matters identified by the Planning Inspector in their Matters, Issues and Questions (MIQs) report concerning the draft Newham Local Plan.
- 1.2 LLDC is a Mayoral Development Corporation that was formed to regenerate the area in and around the Queen Elizabeth Olympic Park (QEOP) following the legacy of the Olympic Games in 2012. Through its urban regeneration projects, the organisation is working on delivering sustainable and thriving neighbourhoods with a focus on housing delivery and good growth. LLDC has a number of strategic sites within the Borough of Newham.
- 1.3 LLDC has been in engagement with the London Borough of Newham (“Newham”) throughout the Regulation 18 and 19 public consultations of the draft Newham Local Plan and has also entered into two Statement of Common Grounds (SoCG) with Newham, referred to as Parts 1 and 2. SOCG Part 1 was between Newham and LLDC both as local planning authority and landowner prior to the transition of planning powers from the LLDC back to the neighbouring boroughs at the end of November 2024, with a focus on strategic cross-boundary matters (reference SD058). SOCG Part 2 was between Newham and LLDC as landowner only with a focus on strategic development sites owned and/or managed by LLDC that will be impacted by the proposed policies (reference SOCG004).
- 1.4 The questions under Matter 6: Housing Development Management Policies that the LLDC wishes to provide comments on are as follows:
- Q6.2(a) – Policy H3 Affordable Housing
  - Q6.3 - Policy H4 Housing Mix

## **2. H3 Affordable Housing**

Q6.2 Is policy H3 justified, consistent with the London Plan and will it be effective in helping to meet the identified need for affordable homes? In particular:

a) The requirement for proposals for ten or more homes to provide 50% of the total as social rent housing and 10% affordable ownership housing (unless a financial viability assessment demonstrates that the maximum viable mix will be delivered).

b) The definitions of affordable housing, affordable home ownership, and affordable rent housing.

- 2.1 LLDC considers that the affordable housing definitions in the draft Newham Local Plan are consistent with definitions of the London Plan and associated planning guidance, and therefore has no comments on this. As such, the response below relates to part a) only.
- 2.2 LLDC was initially supportive of Policy H3 (Affordable Housing) as drafted in the Regulation 18 draft Local Plan, as it was consistent with London Plan Policy H5 (Threshold

## Newham Examination Hearing Statement – Matter 6

approach to planning applications), requiring 50% affordable housing on public land to qualify for the Fast Track Route (FTR). The change of policy for a requirement of 50% of total residential units to be social rent and another 10% to be affordable home ownership at Regulation 19 stage is not consistent with London Plan Policies H5 and H6 (Affordable housing tenure) as it requires a greater proportion of affordable housing. Furthermore, the required tenure split for social rent is significantly higher than that of the London Plan to qualify for FTR. This change in policy could have a significant impact on development viability and deliverability. Given that developments not able to comply with this requirement will need to undertake a thorough viability assessment, it is considered that this policy could delay housing delivery.

- 2.3 We note the announcement by the Government and Mayor of London on 23<sup>rd</sup> October 2025 of a time-limited reduction in affordable housing thresholds “to support a rapid recovery in housing delivery” (Paragraph 13-20 of the *Homes for London: Policy Note*). This will reduce the threshold for FTR to 20% for private land, and 35% for public land. Increasing the threshold to 60% in the new Newham Local Plan would not be consistent with this direction of travel.
- 2.4 Although the ambitions of Policy H3 are recognised given the high demand for affordable housing in the Borough, it is considered that the policy will not be effective in meeting affordable housing need in practice. The majority of developments coming forward are likely to require a thorough viability assessment as there already are viability challenges (e.g. the changes introduced by the Building Safety Act and the lack of funding capacity within the Registered Provider sector) as noted in the *Homes for London Policy Note*. Given the lengthy and costly process of viability assessments, this policy change is anticipated to exacerbate existing challenges further. It is considered that the policy should be aligned with the threshold approach of London Plan Policy H5 (also allowing for any temporary measures as announced by the Mayor of London) in order to be effective and not impede housing delivery.
- 2.5 Policy H3 was also amended at Regulation 19 to exclude allowances for sites that form part of an agreed ‘portfolio approach’, which is not consistent with the London Plan. As set out in our *Matter 3: Spatial Strategy* submission, LLDC has four development sites that form part of a ‘portfolio approach’ to affordable housing delivery; Stratford Waterfront (SWFT), Bridgewater Triangle (BWT), Pudding Mill Lane (PML) and Rick Roberts Way (RRW). This approach was secured in the Section 106 (S106) Agreement of the SWFT hybrid permission (reference 18/00470/OUT). Together these sites must collectively deliver 50% affordable housing (all figures by habitable room), of which 30% must be low-cost rented housing and 70% intermediate housing. Portions of affordable housing to meet the requirements are split between the sites as follows:
  - SWFT – 35% all intermediate
  - BWT – 50% with a 70/30 intermediate and low-cost rent split

**Newham Examination Hearing Statement – Matter 6**

- PML – 45% with a 70/30 intermediate and low-cost rent split
- RRW – The remaining balance to meet the 50% affordable housing by habitable room requirement and the 70/30 intermediate and low-cost rent split of the affordable units.

- 2.6 It is unclear whether development sites within an affordable housing portfolio, will be required to submit detailed viability assessments as part of new or Section 73 applications, where they are not meeting the tenure split required by Policy H3. It is therefore recommended that the implementation text should be amended to take already agreed portfolios into account as in the London Plan Policies H4 (Delivering affordable housing) and H5 (also see paragraphs 4.4.7 and 4.5.6 of the London Plan). This is needed to prevent the policy from undermining the extant permissions and agreements of the affordable housing portfolio where considerable work has already been undertaken to agree the most feasible approach to secure affordable housing delivery. A requirement for detailed viability assessments at such sites could stall development and exacerbate pre-existing delivery challenges that led to the portfolio approach initially being agreed.
- 2.7 It is noted in Newham's Schedule of Modifications (reference SD004) that the policy is proposed to be amended from requiring 10% affordable home ownership to 10% intermediate housing (reference MO62.1) to include a wider variety of intermediate housing products such as Discounted Market Rent (DMR). Whilst this change is welcomed, concerns about the delivery challenges that are likely to be exacerbated by Policy H3 overall remain.

### **3. H4 Housing Mix**

Q6.3 Is policy H4 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for different types of housing? In particular:

The requirements for proposals for ten or more homes to deliver:

- a) 40% of the total as family housing with three or more bedrooms (unless a financial viability assessment demonstrates that the maximum viable mix will be delivered).
- b) No more than 15% of the total to be one bedroom, two person homes and no more than 5% of the total to be studio or one person homes.

And (c), the requirement for proposals on site allocations to provide at least 5% of homes as four or more bedroom family housing.

- 3.1 As raised in public consultation and the Statement of Common Ground with Newham (reference SOCG004), LLDC has concerns about the approach to housing mix in Policy H4 Housing Mix, as it is a blanket requirement that does not allow for site specific context and considerations to be properly taken into account. A degree of flexibility should be applied where schemes are providing other major benefits such as infrastructure and

**Newham Examination Hearing Statement – Matter 6**

where it is evidenced that a high volume of family housing may not be appropriate on a site. There may be cases where a greater mix of smaller units may be needed to optimise a site and contribute towards London-wide housing targets, such as sites close to town centres or locations with high public transport access as set out in Policy H10 Housing size mix of the London Plan.

- 3.2 Given that it is required for developments that do not meet both the 60% affordable housing requirement of Policy H3 and the 40% 3-bedroom+ requirement of Policy H4 to submit detailed viability assessments, it is considered that the policies, cumulatively, will have a negative impact on housing growth in the Borough. Combined with other proposed policies and allocations (please see LLDC's submissions for *Matter 3: Spatial Strategy* and *Matter 4: Neighbourhoods and Allocations*), the policies where applied will limit the development potential and viability of sites, given the required proportion of larger units and social rent to qualify for FTR.
- 3.3 Part 6 of Policy H4, states that a portfolio approach to policies H3 and H4 may be accepted. However, this seems to only apply to new portfolios agreed within the plan period of the draft Local Plan. LLDC propose that acknowledgement be given to sites that form part of an existing portfolio and/or have extant permissions.