

LONDON BOROUGH OF NEWHAM

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT

MAIN MATTER 5:

HOUSING LAND SUPPLY

WE ARE NEWHAM.

Note: Where modifications are proposed as part of the responses below, text to be removed is set out in ~~strike through~~ font and new text is set out in **bold** font.

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)?

Council Response:

1.1 We would be supportive of a modification on this basis. We suggest a modification to the policy's justification text. Housing numbers in this proposed modification reflect the latest housing trajectory position (accurate up to April 2025, based on the higher range trajectory), but they can be updated to reflect any amendments to the housing trajectory through the course of the examination.

1.2 [Paragraph 3.175] 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. **A breakdown of expected delivery from different sources over the course of the plan period is provided below:**

- **Allocations: 42,136**
- **Small sites: 5,700**
- **Windfalls: 3,328**
- **Permissions and resolutions to grant on sites not allocated in the Plan: 2,790**
- **Total: 53,954**

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?

Council Response:

2.1 The table below shows which allocations have increased in capacity because of the extended plan period:

Site allocation	Permission unit total (net)	Application reference	Capacity in Draft Submission Plan (2023-2038)	Capacity in revised housing trajectory (2027-2042)	Notes
N2.SA1 Silvertown Quays	3000	14/01605/OUT & associated reserved	2,931	4,122	Full design led capacity total now

		matters applications			included in the plan period.
N2.SA4 Thameside West	5000	18/03557/OUT	2931	4500	Additional permission units now included within housing target period
N3.SA1 Royal Albert North	434 (Resolution to grant)	24/02307/FUL & 24/00440/FUL	1,919	2,549	Two permissions granted on plots within the site; full design led capacity total now included in the plan period.
N4.SA3 Canning Town Holiday Inn	N/A	N/A	216	223	Design-led capacity testing total error corrected in revised housing trajectory.
N7.SA2 Twelvetree s Park and Former Bromley by Bow Gasworks	6908	23/02033/OUT & 24/01731/VAR	4882	5421	Additional permission units now included within housing target period
N8.SA3 Greater Carpenters District	1445 (4 approved and 1411 resolution to grant)	22/00360/OUT & 21/00543/FUL	1311	1441	Additional permission units now included within housing target period
N8.SA5 Stratford Town Centre West	2294 (1050 approved and 1244 resolution to grant)	24/00067/REM & 24/00068/NMA 23/00441/FUL 21/00416/FUL 23/00441/FUL 24/00113/FUL	2,776	3,669	Permissions granted for individual plots within the site allocation. Remainder is design-led capacity testing.
N8.SA7 Rick Roberts Way	247	23/00457/FUL & 23/00411/NMA	389	391	Non-material amendments to permission. Remainder is design- led capacity testing.
N17.SA1 Beckton Riverside	2977 (Resolution to grant)	24/00989/OUT	3,011	3,214	Extended plan period includes additional design-led capacity testing capacity.

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?

Council Response:

- 3.1 No, the current approach to not include indicative capacities for each site is supported by London Plan Policy D1(B). The London Plan requires the council to undertake capacity assessments for sites but does not require for those capacity figures to be published. The site allocations include design principles for how sites should be optimised for housing as well as requirements for different types of use.
- 3.2 The capacities of the site allocations have been positively prepared and justified by either the design-led capacity work (ED003a, ED003b) which is consistent with London Plan Policy D3 and with the London Plan Guidance on site optimisation, the methodology of this is detailed in Chapter 3 of Newham's Site Allocation and Housing Trajectory Methodology (2025); or the capacity has been informed by planning permissions.
- 3.3 In terms of effectiveness, these capacities have been tested feasible and viable through the design-led capacity work (ED003a, ED003b) and viability assessment (EB099).

Windfalls

Q5.4 Are the assumptions in the Plan about small site and other windfalls justified and consistent with national policy?

Council Response:

- 4.1 Yes. An amended housing trajectory (Housing Trajectory FY2024.25 EXAMINATION PINS) has been attached as part of this response. This trajectory has been updated in consultation with the Greater London Authority, using the following data sources and assumptions:
- The trajectory incorporates completions data from financial year 2024/25.
 - We have extended the plan period to 2041/42, to allow for a 15-year housing target post-adoption.
 - We propose the housing target period as being 2027/28 to 2041/42 (the 15-year period following the plan's adoption; and
 - Delivery rates are based on information provided by developers or landowners (for example, planning application data or published information from developers). Where such information does not exist, the Housing Trajectory Phasing Methodology is utilised (see EB058, Table 8, pp.34-36). No maximum annual delivery rate is assumed.
- 4.2 The key difference in the approach between the latest housing trajectory assumptions and the Draft Submission Local Plan housing trajectory is the approach to the maximum annual delivery rate. As per the Site Allocation and Housing Trajectory Methodology Note 2025, a delivery rate of between 150 and 200 units per year was assumed for schemes

(EB058, p.35), which informed the Draft Submission version of the Local Plan's housing target. However, the latest version of the trajectory removes this upper limit on absorption rates, recognising the scale of Newham's site allocations mean that annualised delivery rates on allocations are likely to be higher than this assumption. This approach is justified by the approach being based on developer phasing on many of these allocations, as well as numerous examples of schemes which have delivered more than 200 homes per annum in recent years. These include sites such as Seagull Lane (20/00544/FUL), UCL East (17/00235/OUT), Deanston Wharf (16/00527/FUL), Manor Road (18/03506/OUT), Areas 7 and 1C Barking Road (17/04046/REM & 17/04045/VAR), Parcelforce (24/01731/VAR & 24/01733/REM) and Stratford International Bus Layover (19/00391/FUL).

4.3 To create an effective housing target for different phases of the plan period, we have proposed a stepped trajectory with an annualised target for each phase of the plan period as follows:

Phase	Time period	Proposed annualised target	Proposed method for annual target calculation
Phase 1a (Short term – 2021 London Plan period)	27/28 – 28/29	4,760	London Plan 2021 target of 4,760 homes per year
Phase 1b (Short term)	29/30 – 31/32	2,542	Average higher range housing delivery across these years, allowing for a 20% buffer to be delivered across the full short-term phase of the plan period.
Phase 2 (Medium term)	32/33 – 36/37	2,631	Average lower range housing delivery across the phase
Phase 3 (Long term)	37/38 – 41/42	3,062	Average lower range housing delivery across the phase

4.4 For further context on the rationale behind the target setting during different phases of the plan period, this is provided in response to matter Q2.2(c).

4.5 This trajectory update would assume the following delivery on windfall sites across the plan period:

Annual housing targets					
	Phase 1a (Short term – 2021 London Plan period)	Phase 1b (Short term)	Phase 2 (Medium term)	Phase 3 (Long term)	Average annual delivery
Windfall	27/28 – 28/29	29/30 – 31/32	32/33 – 36/37	37/38 – 41/42	27/28 – 41/42
Small sites	760	1140	1900	1900	380
Other	0	0	0	3328	222
Total	760	1140	1900	5228	602

4.6 In accordance with paragraph 72 of the National Planning Policy Framework (NPPF), historic data trends show windfall delivery has, on average, been similar to projected windfall assumptions during the plan period: an average historic delivery of 581 homes per year versus a projected delivery of 602 per year. Average historic delivery on small sites (319 homes per year) is expected to increase over the Local Plan period, noting that Newham have now published a Small Sites Intensification Guidance 2024 (EB022). 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.

4.7 In the long-term phase of the plan period, capacity on other windfall sites is derived from Greater London Authority 2017 Strategic Housing Land Availability Assessment sites and lapsed permissions. These capacity figures are therefore robust, noting the former sites informed the calculation of the adopted London Plan housing target, while the latter are based on permissions previously secured for these sites. To support the effectiveness of the target, these other windfall sites are phased in the longer term, noting they have less certainty of medium-term delivery than site allocations or approved planning permissions; however, it is expected that some of these sites are likely to be delivered more quickly than the conservative assumptions that have informed the phasing in the plan (as per historic delivery rates). These would still be considered to be developable sites as per the NPPF definition (in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged).

Q5.5 If the plan period were to be extended to 2042, how, if at all, should the small site and windfall allowances be modified?

Council Response:

5.1 We would support a modification to the policy text to clarify the expected housing delivery from different sources (including windfall) over the plan period. This modification text is set out in response to Q5.1.

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?

Council Response:

6.1 Yes, 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 are justified.

6.2 To note, the 6,720 new homes on sites with planning permission referred to in response to PQ23 only applied to sites outside of allocations.

6.3 The update to the housing trajectory that has been circulated to the Inspector alongside this response provides an update on the number of sites with planning permission or a resolution to grant (Housing Trajectory FY2024.25 EXAMINATION PINS). Noting the proposed extended plan period to 2042, the following unit numbers are expected on these sites (note this data includes site allocations):

	Projected delivery 2027/28-2041/42
Planning permissions	17,823
Resolutions to grant	4,177
Total	22,000

6.4 As part of the annual starts and completions exercise Newham provides the opportunity for developers to indicate their expected delivery rates. This data, along with the borough's Housing Trajectory Phasing Methodology (see EB058, Table 8, pp.34-36), is used to inform phasing of planning permissions and resolutions to grant over the plan period. Sites with planning permission tend to contain information in the application submission around expected delivery rates, usually as part of the application form or Environmental Impact Assessment. This data has been used to underpin phasing in the borough's latest housing trajectory.

6.5 With regards to a lapse rate, where information is submitted to the Council that indicates a scheme has lapsed or is likely to lapse, this capacity is moved into the long-term phase of the plan period. Newham's latest trajectory is up to date with this data. Currently 388 homes are included in the trajectory that meet this definition, a very small proportion of overall delivery in the housing target period (<1%).

6.6 The only exception to this is where developer information indicates that schemes that have lapsed or will not progress will be resubmitted sooner for a new scheme. Newham's latest trajectory is up to date with this data. These include sites such as:

- 17/02586/FUL – Lapsed permission for 323 units with new pre-app submitted within the past year to redevelop the site.
- 19/01791/FUL – Commenced permission for 252 units indicated as unlikely to progress under starts and completions exercise; however, a pre-app on non-material amendments to the application submitted within the past six months.

- 14/00618/OUT – Commenced application for 845 units which is not progressing. Site has been submitted through the call for sites process for redevelopment led by the Royal Docks team.
- 22/00098/FUL – Approved application for 465 student accommodation bedspaces indicated as unlikely to progress under starts and completions exercise; however, a variation of condition application has been submitted within the past month for the application.

6.7 In each of these cases, latest information from developers suggests that these will be delivered, at least in part, in the short to medium terms phases of the plan period, and they have been phased on this basis.

6.8 Noting the low numbers of units that have lapsed in recent years with no developer interest to resubmit the permission, we do not consider a lapse rate being applied to permissions is necessary, noting the relatively minor impact such schemes currently have on the trajectory and the developer interest in sites where previous permissions have not progressed.

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?

Council Response:

7.1 This information is supplied in response to Q5.2. Note the only sites with permission which have increased total capacity are located on site allocations.

Five-year requirement following adoption

Q5.8 (a) Is the relevant period for considering five year supply following the intended date of adoption 1 April 2027 to 31 March 2032? (b) Based on the housing requirement in the Plan (51,425 homes) and stepped trajectory, is the requirement for that five year period (including an appropriate buffer) 21,982 homes?

Council Response:

8.1 a) Yes, we consider this period for the 5-year land supply is correct, noting it is five years following the adoption of the plan.

8.2 b) The Housing Trajectory FY2024.25 EXAMINATION PINS attached to this response shows we can meet the 5-year land supply housing requirement of 21,982. Delivery figures are comprised of:

- Small sites: 1,900 units
- Site allocations: 17,423 units (of which 13,321 have planning permission or a resolution to grant)
- Approvals and resolutions to grant outside of site allocations: 2,790
- Total: 22,113

8.3 This delivery against the target of 21,982 (which incorporates the 20% buffer requirement) results in a five-year land supply of 5.03 years

8.4 Sites which do not yet have planning permission or resolution to grant are considered to have enough certainty to include in the five-year land supply on the following basis:

Site allocation	Source informing site capacity	Total site capacity	Units in 5-year land supply	Reasoning
Silvertown Quays	Design-led capacity testing	4522	1470	<p>3000 units currently benefit from planning permission under reference (14/01605/OUT). Reserved matters approval secured for 1869 units.</p> <p>Revised scheme pending consideration for 6,565 –7,172 new homes (ref. 22/02855/OUT).</p> <p>Phased to align with information published by the developer Silvertown Lendlease</p>
Sugar House Lane	Permission and design-led capacity testing	831 (738 units with detailed consent and 93 units design-led capacity tested)	586	Majority of the site benefits from detailed consent. Remaining plot is in outline for 60 homes. Design-led capacity testing represents a minor increase in this figure by 33 homes.
Bridgewater Road	Design led capacity testing	677	677	<p>575 units benefit from planning permission under 21/00403/OUT.</p> <p>EIA scoping report submitted under reference, 25/01197/SCOPE, which shows a proposed unit increase to 732 units. Phased as per the delivery timeframe in the scoping report.</p>
Lyle Park West	Design led capacity testing	810	648	<p>Application and under construction for part of the site for 252 units under reference 19/01791/FUL. Indicated as unlikely to progress under the starts and completions exercise. A pre-app on non-material amendments to the application submitted within the past six months.</p> <p>Application for the rest of the site submitted for 1667 units under reference 24/02083/OUT. Phased as per application form which suggests construction between January 2027 and December 2032</p>
Connaught Riverside	Design led capacity testing	1384	721	Application for the site submitted for 1685 units under reference 24/02339/OUT. Phased as per details in planning application form.

8.5 Notwithstanding the above, we consider it is appropriate to propose amendments to the borough's housing targets based on the updated housing trajectory. This would ensure the target remains capacity derived and based on the latest housing trajectory data. Importantly, the following proposed target allows the borough to retain the London Plan (2021) housing target for Newham in the remaining London Plan target years, which the Greater London Authority (GLA) supports in the Statement of Common Ground agreed between Newham and the GLA. In order to demonstrate a five-year land supply, we suggest the following amendments to the housing phases and annual targets:

	Phase 1a (Short term: London Plan) 27/28 - 28/29	Phase 1b (Short term) 29/30 - 31/32	Phase 2 (Medium term) 32/33 - 36/37	Phase 3 (Long term) 37/38 - 41/42	Total
Annual housing target	4,760	2,542	2,631	3,062	
Total target for each phase	9,520	7,626	13,155	15,310	45,611

8.6 Note commentary on how the capacity is derived for each phase (i.e. from the higher and lower capacity range) is set out in response to Q2.2(c).

8.7 If these targets were used to measure land supply, Newham's land supply position would be as follows:

5-year target	17,146
5-year target + 20% buffer	20,575
Projected delivery	22,113
Years worth of supply	5.37

8.8 To note, if this revised stepped trajectory is accepted, we would suggest modifications to Policy H1's justification text, to reflect the latest trajectory projections. These are outlined below:

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.

[...]

~~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 the housing trajectory projects this delivery rate suggests.~~