

LONDON BOROUGH OF NEWHAM

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT

MAIN MATTER 6:

HOUSING DEVELOPMENT MANAGEMENT POLICIES

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

Q6.1 Is policy H2 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for affordable, family and specialist housing?

Council Response:

- 1.1 Yes. The policy's justification text (paragraphs 3.177 to 3.179) sets out how Policy H2 responds to the identified need for housing and, in particular, family-sized accommodation in the borough. Critically, Newham has the highest housing target in London now that planning powers have been transferred back to the borough from the London Legacy Development Corporation. Given the ambitious targets set for the borough at a regional level (4,760 homes per year), and the need to address historic housing delivery shortfalls, it is important to protect all forms of accommodation from conversion to non-residential uses. To do otherwise risks eroding the borough's housing stock, placing further pressure on residents at the forefront of the housing crisis.
- 1.2 Within this, there is also a need to ensure certain forms of housing are protected from conversion and/or subdivision. Part 1.a. of the policy seeks to protect affordable housing and social rent floorspace, noting the significant need for these forms of accommodation identified in the Newham Strategic Housing Market Assessment (SHMA) (EB056). Figure 51 of the SHMA (p.67), which calculates need based on the GLA Capacity Target of 4,760 dwellings per annum, shows an overall affordable housing need of 53%, split 66%:34% between social rent and intermediate tenures.
- 1.3 Specialist forms of housing are protected under Part 1.b of the policy in accordance with policy H6.1, which considers the quality and need for accommodation before such forms of housing can be converted. This policy part has been formulated in close consultation with Newham's commissioning teams, noting a current lack of quality accommodation in the borough to meet certain specialist housing needs. This is discussed further in response to Q6.5.
- 1.4 Part 1.c of the policy protects family dwellinghouses (homes with 3 or more bedrooms) from conversion, unless meeting the exceptional circumstances set out under parts 2, 3 or 4 of the policy. Figure 51 of the SHMA (EB056, p.67) shows an overall family housing need of 59%, a figure notably in excess of the plan's family housing target on sites set out through policy H4 parts 2 and 3.
- 1.5 Noting the significant need for these forms of accommodation, as highlighted through the SHMA and relevant commissioning services, it is important to not place additional pressures on these homes through unrestricted conversion or subdivision to more economically profitable forms of housing. The policy approach is informed by the National Planning Policy Framework paragraph 63, which sets out that the "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.". It also accords with the London Plan Policy H8 (EB001, pp.185-186), which requires:

- “Loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace) (Part A)
- “Loss of hostels, staff accommodation and shared and supported accommodation that meet an identified housing need should be satisfactorily re-provided to an equivalent or better standard.” (Part B)
- “Demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing.” (Part C).

1.6 To ensure the effectiveness of the policy position, parts 2 to 4 of the policy provide exceptions that would allow for the conversion or subdivision of existing three or more-bedroom homes. Part 2 of the policy recognises that there may be homes of a size large enough to allow for the delivery of an additional home, while not undermining the quality of the existing unit. These subdivided homes would still be subject to amenity considerations under other design policies, to ensure new units wouldn't increase overlooking or result in a significantly detrimental impact to neighbouring residents.

1.7 Part 3 of the policy allows conversions of existing sites that are not suitable for family accommodation, due to being located at upper levels without access to amenity space or with unsuitable entrances. Such units can be challenging particularly for families with young children who may need to carry heavy equipment upstairs. This policy approach is reflected in Newham's adopted Local Plan (H4.2.a), albeit some minor additional flexibility has been incorporated based on experience of implementing of the policy. This additional flexibility includes allowing for conversions where homes do not have access to external private amenity space or have poorly defined entrances, noting both conditions can render homes unsuitable for families.

1.8 Part 4 of the policy seeks to address the significant numbers of single Newham residents in temporary accommodation. As per Policy H2's justification text, Newham has consistently had the highest rates of homeless households in temporary accommodation in the country [Source: [Homelessness statistics - GOV.UK](#)]. A significant proportion of this need relates to single residents under the age of 35, who are subject to the shared accommodation rate for housing benefit. These residents will need to be housed by the Council in shared accommodation; however, since 2013 Newham has had an Article 4 direct in place that seeks to reduce the numbers of family homes lost to conversion to Houses in Multiple Occupation (HMO) under permitted development rights. Therefore, supply of new homes to meet these needs has been limited, and part 4 of policy H2 seeks to address this issue. The policy also applies to Care Leavers, who can also face similar challenges in accessing HMOs when they turn 18. Permissions for these conversions will only be allowed on a temporary basis of up to five years, noting the need to not undermine supply of family accommodation in the long term, which remains Newham's highest housing needs alongside affordable housing. Locational criteria are also included for large houses in multiple occupation, to ensure requirements align with policy H9.

1.9 The policy has been formulated in close collaboration with commissioning teams who will utilise this policy exception, to ensure its effectiveness; however, since Regulation 19 we have suggested minor modifications to the policy text (and in two cases the text of Policy

H9) reflecting updated commissioning approaches to meeting this need. These are outlined in the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan through modification references MO54.4, MO54.6, MO54.7 MO59.1, MO54.5, MO60.1 and M60.2 (SD004, pp.38-40).

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.

Council Response:

- 2.1 (a) Yes. The target proposed through the Regulation 19 Submission Local Plan seeks to address the overwhelming housing challenges the borough faces through prioritising the delivery of social rent homes. Figure 51 of Newham's Strategic Housing Market Assessment (EB056, p.67) shows a breakdown of Newham's housing need based on the London Plan housing target of 4,760 homes per annum. The table shows that affordable housing need constitutes 53% of housing need, and 66% of affordable need is for social rent housing. However, this need figure may have subsequently risen, noting the study was undertaken in 2022. Since 2022 numbers of homelessness households in temporary accommodation in the borough have risen, with latest data showing Newham had the highest rate of temporary accommodation in London with 59 households per 1,000 households [Source - [Statutory homelessness in England: April to June 2025 - GOV.UK](#)].
- 2.2 While the plan is being examined under the 2023 National Planning Policy Framework (NPPF), the 2024 NPPF includes multiple specific references to delivering social rent to meet housing need and not precluding schemes mainly for social rent (paragraphs 63, 64, 66 & 71, pp.17-19). These amendments to national policy show a clear commitment from central government to recognise and address affordability challenges and delivering homes to address those with the highest priority housing needs. The approach in Newham's Local Plan seeks to do the same through policy H3.
- 2.3 We note the Local Plan approach differs from the 'threshold approach' set out in the London Plan. The London Plan (EB001) seeks to incorporate a threshold approach to applications through Policy H5, allowing for a 'fast tracked' decision-making process, without the need for a viability assessment, where schemes meet either 35 or 50% affordable housing (the higher threshold being sought on publicly owned and industrial land). However, the London Plan policy does incorporate borough discretion in applying this requirement through part C.3, which requires applications following the fast-track route to "meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant" (p.191).
- 2.4 Since the adoption of the London Plan, Newham have utilised this discretion, and viability tested schemes which do not meet the affordable housing requirements set out in adopted Local Plan Policy H2. We continue to argue that such an approach is justified in the Newham context, noting the borough's significant need for both affordable and social rent

homes. Indeed, this is borne out in monitoring data since the adoption of Newham's Local Plan. While completions have fluctuated significantly since 2018/19, largely as a result of phased delivery of affordable homes (i.e. schemes delivering over multiple years delivering all affordable homes in a single year) and lower completion levels seen across London's housing market, approvals of affordable housing remain consistently above 30%, reaching 40% and 39% in financial years 2021/22 and 2022/23 respectively (EB003, Table A3.11, p.30). Adopting an approach that sees the majority of schemes viability tested has not led to lower affordable housing approvals. Indeed, lowering the target to a level that most schemes could viably deliver could lead to schemes that could have delivered more than the reduced target no longer being required to do so.

2.5 While the Viability Report (EB099) that supports the Local Plan shows viability challenges in meeting the affordable target set out in Policy H2, the report shows that there are some development circumstances in which the emerging policy target of 60% could be viable and therefore recommends the policy requirement be 'subject to viability' (paragraph 1.7, pp.3-4). Accordingly, policy H3 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. This approach also accords with the Integrated Impact Assessment's recommendations, which states that the inclusion of viability testing in the policy provides sufficient flexibility and a lower threshold does not need to be treated as a reasonable alternative (SD007, p.151).

2.6 It should be noted that the viability testing for the Local Plan was undertaken in a particularly challenging viability context, with construction costs and interest rates being abnormally high. Any improvements to economic circumstances will mean the policy will become easier to deliver over the plan period. For example, Bank of England Data shows that since the publication of the viability report interest rates have dropped from 5.25% to 4% [Source: [Bank Rate history and data | Bank of England Database](#)].

2.7 (b) Yes, we consider these definitions to be justified, consistent with the London Plan and effective. While the definitions are not fully aligned with the National Planning Policy Framework (NPPF) (2023) glossary, they have been amended to reflect the London context. In particular, the Local Plan definitions reflect the preferred affordable housing tenures set out in the London Plan (EB001, paragraphs 4.6.3 to 4.6.7, pp.182-183). This sets out that the Mayor's preferred affordable housing tenures are:

- homes based on social rent levels, including Social Rent and London Affordable Rent
- London Living Rent; and
- London Shared Ownership.

2.8 The definition in the Local Plan glossary for affordable rent housing broadly aligns with that in the NPPF, with the requirement to remain at affordable prices captured through the broader 'Affordable housing' definition. Unlike the NPPF, social rent housing is defined separately to affordable rent, noting that Policy H3 specifically requires the delivery of a social rent housing target (rather than social or affordable rent as low-cost rent products). This tenure specific target has been formulated to respond to the bulk of Newham's affordable need being for social rent housing (as identified in Newham's Strategic Housing Market Assessment, EB056, Figure 51, p.67 – see also the response to Q6.2(a)).

2.9 The tenures listed in the Local Plan glossary definition of affordable home ownership capture those listed within the NPPF, alongside London Living Rent, which is a product specific to London.

2.10 These amendments to the definitions improve the effectiveness of the affordable housing policies' implementation in the London context and reflect Newham's aspirations to prioritise the delivery of social rent homes above other low-cost rent affordable housing products.

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.

Council Response:

3.1 (a) Yes, the housing mix targets within Policy H4 are justified, consistent with the London Plan and will be effective in meeting Newham's priority housing needs.

3.2 Newham's Strategic Housing Market Assessment (SHMA) sets out need calculations for the borough. Figure 48 sets out need for the borough in isolation, while figure 51 calculates need based on Newham's Greater London Authority housing target of 4,760 homes per year. The period of need assessed captures need between 2021 and 2038.

Figure 48: Newham need			
	Affordable	Market	Total (% of total need)
1 bedroom	520	5,236	5,756 (10%)
2 bedroom	6,892	9,221	16,113 (29%)
3 bedroom	12,801	17,508	30,309 (54%)
4+ bedrooms	4,923	-1,415	3,508 (6%)
Figure 51: London Plan housing target need			
	Affordable	Market	Total
1 bedroom	3,103	6,232	9,335 (12%)
2 bedroom	14,906	8,464	23,370 (29%)
3 bedroom	19,667	23,529	43,197 (53%)
4+ bedrooms	5,581	-749	4,831 (6%)

[EB056, Figure 48, p.64 and Figure 51, p.67]

- 3.3 The above data shows a clear need for 3-bedroom homes above all other unit sizes, with this need reflected in both the affordable and private tenures. We have therefore included a 3-bedroom specific target within policy H4 to meet this need. Formulating policy H4's target on the basis of robust evidence of local need accords with London Plan Policy H10.A1 [EB001, p.189]. It also accords with the National Planning Policy Framework paragraph 63, which sets out that "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies."
- 3.4 Recognising the majority of housing need identified through the SHMA is for three-bedroom homes, it is important to ensure effective delivery three-bedroom homes through the plan. As such, policy H4 stipulates a threshold to try to boost 3 bed supply, particularly as larger units are less desirable to developers than 1 and 2 beds that need little incentive to deliver, given their potential to yield a higher return.
- 3.5 At the Regulation 18 stage of policy formulation, delivery of family housing was tested using three scenarios: 60%, 50% and 40% family housing. The 40% target was taken forward, noting that testing for the two higher mix percentages were shown to have a significant impact on residual land values (EB099, paragraph 1.7, p.4n).
- 3.6 At the Regulation 19 stage, the Viability Report looked at three mix scenarios:
- Scenario 1: 15% one beds; 45% two beds; 35% three beds; 5% four beds; and
 - Scenario 2: 5% studios, 10% one beds; 45% two beds; 35% three beds; 5% four beds; and
 - Scenario 3 which tested different mixes for private and affordable elements of the schemes.
- (EB099, paragraph 1.7, p.4)
- 3.7 Scenario two was taken forward as the preferred tenure mix scenario, noting the less restrictive approach to studio provision adopted following the Regulation 18 consultation. While the viability testing demonstrates challenges with viability in the context of the 83:17 percentage split between social rent and intermediate tenures at 60% affordable housing, the testing indicates that this is primarily impacted by the ambitious affordable housing target. For example, when affordable delivery is at 35% on secondary industrial and cleared sites, the testing shows that a significant number of sites are shown to be viable (EB099, Table 6.11.2 and 6.11.3, pp.50-51). Indeed, this was demonstrated through the Regulation 18 viability report, which concluded that the provision of 40% family was broadly viable (EB099, paragraph 6.20, p.53).
- 3.8 Three-bedroom policy requirements remain subject to viability, especially as the optimisation of a site remains important. Viability negotiations as part of the development management process provide inherent flexibility to the policy framework, ensuring the policy is effective and results in optimal housing mix where the targets in policies H3 and H4 cannot be met.
- 3.9 (b) Yes. Newham's Strategic Housing Market Assessment (SHMA) sets out need calculations for the borough. Figure 48 sets out need for the borough in isolation, while figure 51 calculates need based on Newham's Greater London Authority housing target

of 4,760 homes per year. The period of need assessed captures need between 2021 and 2038.

- 3.10 As the table provided in response to Q6.3(a) shows, the mix targets in policy H4 for one bedroom and studio units are set at a level above identified need through the SHMA. This approach seeks to improve viability of schemes, in particular through allowing a proportion of one-bedroom homes to be delivered as studio or one-bedroom one person units. The policy also seeks to prioritise the delivery of larger homes, which constitute the bulk of identified need in the borough.
- 3.11 We note that part four of the policy refers to one bedroom, two-person dwellinghouses. In order to more closely align the target with need, and account for the Regulation 19 Draft Submission Local Plan's new allowance for studio units under part 5 of the policy, we have proposed modifications for the Inspector's consideration through the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan under reference MO64.1, MO64.2 and MO64.3 (SD004, pp.41-42).
- 3.12 Formulating policy H4's target based on robust evidence of local need accords with London Plan Policy H10.A1 [EB001, p.189]. It also accords with the National Planning Policy Framework paragraph 63, which sets out that "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies."
- 3.13 Placing an upper limit on delivery of studios also recognises that this form of housing, due to its size, lacks the flexibility to meet people's changing needs over the course of their lifetime, which may inadvertently result in increased population transience. Allowing a small proportion of studios seeks to strike the correct balance between acknowledging studios positive impact on viability (EB099, paragraph 7.2, p.68), while not undermining the delivery of quality homes that are adaptable to people changing needs. Furthermore, this policy requirement is not subject to viability testing, meaning that officers can weigh the provision of one bedrooms and studios as part of the planning balance without this causing delay to the decision-making process.
- 3.14 (c) Yes. Newham's Strategic Housing Market Assessment (SHMA) sets out need calculations for the borough. Figure 48 sets out need for the borough in isolation, while figure 51 calculates need based on Newham's Greater London Authority housing target of 4,760 homes per year. The period of need assessed captures need between 2021 and 2038.
- 3.15 As the table provided in response to Q6.3(a) shows, both calculations of need show 4+ bedroom homes as being required in the affordable tenures, with the SHMA showing this need is predominately for social rent homes. This has also been reflected in feedback we have received from the Council's Housing teams, with need for increased four-bedroom housing provision being shown on Newham's housing register and waiting list for wheelchair adapted dwellings. More broadly, latest Census data from 2021 also shows Newham as being one of the areas with the highest average household size in the country (3.0 residents per household) ([Household and resident characteristics, England and Wales - Office for National Statistics](#)).

- 3.16 Formulating policy H4's target on the basis of robust evidence of local need accords with London Plan Policy H10.A1 [EB001, p.189]. It also accords with the National Planning Policy Framework paragraph 63, which sets out that "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies."
- 3.17 Data from the Greater London Authority's residential completion dashboard shows that in recent years delivery of four-bedroom homes has not kept pace with need. Between 2021/22 and 2024/25, only 33 homes with four or more bedrooms have been delivered. Similar to the three-bed housing target, policy H4 stipulates a threshold to try to boost 4+ bed supply, particularly as larger units are less desirable to developers than 1 and 2 beds that need little incentive to deliver, given their potential to yield a higher return.
- 3.18 In the case of four or more-bedroom homes, these requirements only apply to site allocations, noting these sites can strategically influence housing delivery across the borough and, given their scale, are more able to viably masterplan the delivery of larger units. It should be noted that this policy requirement is not subject to viability testing, meaning that officers can weigh the provision of four or more-bedroom units as part of the planning balance without this causing delay to the decision-making process.

H5 Build to Rent housing

Q6.4 Is policy H5 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for rented housing? In particular:

a) Are the criteria for defining Build to Rent set out in part 1 consistent with national guidance⁴² and London Plan policy H11?

b) The requirements in parts 2, 3 and 4 relating to the provision of affordable housing in Build to Rent schemes

Council Response:

- 4.1 Yes, these criteria are consistent with national guidance and the London Plan Policy H11. To demonstrate this, a breakdown of each criterion set out in H5.1, and their consistency with national guidance and London Plan policy H11 are set out in the below table:

Criteria	Relevant policy and/or guidance the criteria is based on
a. the development or block or phase within the development should operate under unified ownership and management, within blocks or phases of at least 50 dwellinghouses (C3)	<p>London Plan Policy H11.B1 - the development, or block or phase within the development, has at least 50 units</p> <p>London Plan Policy H11.B5 - there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme.</p>
b. all the dwellinghouses (C3) are self-contained and let separately	London Plan Policy H11.B4 - all the units are self-contained and let separately.
c. the dwellinghouses (C3) should be held as Build to	London Plan Policy H11.B2 - the homes are held as Build to Rent under a covenant for at least 15 years.

Rent under a covenant for at least 15-years	PPG [Paragraph: 007 Reference ID: 60-007-20180913] - Consideration should also be given to a covenant period for the retention of private market rent homes in that tenure and potential compensation mechanisms in the event that private market rent homes are sold before the expiration of an agreed covenant period.
d. a clawback mechanism is in place that ensures there is no financial incentive to break the covenant	<p>London Plan Policy H11.B3 - a clawback mechanism is in place that ensures there is no financial incentive to break the covenant.</p> <p>PPG [Paragraph: 007 Reference ID: 60-007-20180913] - Circumstances may arise where developers need to sell all or part of a build to rent scheme into owner occupation or to multiple landlords or, exceptionally, to convert affordable private rent units to another tenure. The section 106 should consider such scenarios and, in particular, include a mechanism to recoup ('clawback') the value of the affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure.</p>
e. the development, block or phase within the development should offer long term tenancies for private renters for a minimum of three years with a six-month break clause in favour of the tenant	<p>London Plan Policy H11.B6 - longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months</p> <p>PPG [Paragraph: 010 Reference ID: 60-010-20180913] - The national policy definition of build to rent in the National Planning Policy Framework glossary states that build to rent developers will as a norm offer longer tenancy agreements of 3 years or more to all new tenants who want one.</p> <p>PPG – [Paragraph: 010 Reference ID: 60-010-20180913] Tenants should not be locked into longer tenancies for the full period of the agreement. Tenants should have the option to terminate at 1 months' notice, after the first 6 months, without a break fee being payable.</p>
f. providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance	London Plan Policy H11.B10 - providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

g. structured and limited in-tenancy rent and service charge increases should be made clear to the tenant in advance of the tenancy agreement signature, including any annual increases which should always be formula-linked	<p>London Plan Policy H11.B7 - the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked</p> <p>PPG [Paragraph: 010 Reference ID: 60-010-20180913] - Where the rent or service charges are to be reviewed during the period of the tenancy, the basis for the review and for calculating the increase (whether as a fixed percentage or index linked to inflation) should be clearly set out in the tenancy agreement.</p>
h. there is on-site management	London Plan Policy H11.B8 - there is on-site management. This does not necessarily mean full-time dedicated on-site staff, but that all schemes need to have systems for prompt resolution of issues and some daily on-site presence.
i. providers have a complaints procedure in place and are a member of a recognised ombudsman scheme	London Plan Policy H11.B9 - providers have a complaints procedure in place and are a member of a recognised ombudsman scheme

[EB001, Policy H11, pp. 192-193].

- 4.2 (b) Yes, the requirements in parts 2, 3 and 4 of policy H5 are justified, consistent with the London Plan and effective. The response to Q6.2(a) above sets out the rationale for the affordable housing target set out in Policy H3 of the plan. As per this response, Newham's Strategic Housing Market Assessment (SHMA) set outs that the majority of Newham's affordable housing need is for social rent homes [EB056, Figure 51, p.67]. Therefore, part 2 of policy H5 sets out that where Build to Rent is provided as part of a block or phase within a larger development, developers are expected to deliver affordable housing that meets the requirements of Local Plan Policy H3. This helps to ensure that affordable housing delivery is prioritised in line with the borough's housing need for social rent housing.
- 4.3 Developments of Build to Rent housing as the sole residential tenure are required to provide affordable housing at a level that is equivalent to our strategic affordable housing target, albeit acknowledging the build to rent model should be rented and managed under unified ownership. Therefore, the policy requires these rents to be set at levels that are at equivalent to London Affordable Rent and London Living Rent. Notwithstanding the soundness of the policy approach in Policy H5, Newham have suggested modifications to the policy and implementation text to improve the effectiveness of the policy's implementation. These changes include:
- amendments to clarify that affordable homes do not need to be managed by a separate Registered Provider; and

- changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website.
- 4.4 Text of these suggested modifications are provided in Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan under references MO65.1 and MO65.2 (SD004, pp.41-42).
- 4.5 The target in policy H5.3 both seeks to meet the needs of residents identified in the SHMA, while also ensuring there is no financial incentive for developers to deliver Build to Rent over build for sale schemes as a result of differing affordable housing requirements. While the London Plan sets expectations for delivering affordable housing under the fast-track approach for build to rent schemes, the policy requirement does allow flexibility for Boroughs to publish guidance setting out the proportion of Discount Market Rent homes to be provided at different rental levels to benefit from the Fast Track Route (see London Plan Policy H10.C, EB001 - p.193). Newham has set out our expectations for rent levels through the policy requirements of H5.3.
- 4.6 Part 4 seeks to ensure the policy is effective, requiring that affordable and family housing provision are subject to a viability assessment where relevant policy targets cannot be delivered on site. These viability assessments are required to incorporate viability testing that set outs outcomes in relation to 'Build for Rent' and 'Build for Sale' approaches and the subsequent impact upon the delivery of affordable housing. This approach has been taken forward from Newham's adopted Local Plan and allows Officers to transparently assess the optimal level of genuinely affordable and family housing that a site can deliver. The approach also accords with the London Plan Policy H10.D, which requires viability assessments on such schemes to take account of the differences between Build to Rent and Build for Sale development (EB001, p.193). As per the PPG guidance (Paragraph: 008 Reference ID: 60-008-20180913), providing this information through the viability assessment process can also assist with calculating the clawback mechanism for a scheme. Noting the design quality requirements for build to rent and build for sale homes are the same under Local Plan Policy H11, this requirement will not be unduly onerous to the developer to provide as this would not require the production of different architectural drawings for dual viability assessments.

H6 Supported and specialist housing

Q6.5 Is policy H6 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for specialist housing?

Council Response:

- 5.1 Yes. The policy requirements have been formulated in close collaboration with the Council's relevant commissioning teams, to ensure they meet local need for specialist accommodation and are effective in their delivery. As per the policy's justification text, discussions with Newham's Adult Social Care team shows that people who need specialist or supported housing are often housed outside the borough given a lack of available Newham-based housing. For example:

- The Council has found it increasingly difficult to source Dementia placements with 57% purchased out of the borough. Similarly, placements for older residents with a Learning Disability or Mental Health need are also becoming more difficult to source. [Source: Market Position Statement, Older Adults (65+) Care Homes, UPDATED December 2024 - [Market Position Statements – Market Shaping – Newham Council](#)]
- As of May 2024, the Council has 390 residents aged 65+ who have been placed in a Residential (223) or Nursing Home (167). Of these, around half are located outside of Newham. Around 60% of those residing out of borough are a result of resident / family choice, with the remaining 40% placed out-of-borough due to lack of in-borough capacity (i.e. an actual bed, or the Homes advising they are unable to meet the residents' need). [Source: Market Position Statement, Older Adults (65+) Care Homes, UPDATED December 2024 - Market Position Statements – Market Shaping – Newham Council]

5.2 Accordingly, the policy's approach to this issue is twofold: protecting existing quality accommodation in consultation with commissioning teams, through part 1 of the policy, and supporting the delivery of new quality provision aligned with need.

5.3 Of key importance to Newham commissioning teams is the quality of accommodation, the appropriateness of the location for different groups and the local need for the facility. The implementation text for part 2 of the policy clarifies how this will be assessed, namely:

- using relevant quality standards in policy H11;
- early engagement with relevant London Borough of Newham commissioning teams around location; and
- parts 3 and 4 of the policy in relation to demonstrating local need.

5.4 As per part 3 of the policy, local need is expected to be demonstrated by having regard to the Council's or other relevant public sector bodies' strategies and evidenced through early engagement with relevant London Borough of Newham commissioning teams. Under part 4 of the policy, new specialist or supported housing for people with care needs should also ensure residents from outside of Newham should not comprise more than 33 per cent of the total residents, with the exception of sheltered housing for older people. This requirement is proposed to be carried over from Newham's adopted Local Plan, noting historic trends of other Councils using Newham-based specialist accommodation for their residents, owing to the borough's comparatively cheaper rents. This has restricted the amount of available accommodation for Newham residents, leading to commissioners needing to make placements outside of the borough.

5.5 The London Plan Policy H12 (EB001, p.197) states that boroughs should undertake assessments of the need for short-term, medium-term and permanent supported and specialised accommodation within their borough, and support the delivery, retention and refurbishment of supported and specialised housing meeting an identified need. Newham has undertaken this through the Newham Strategic Housing Market Assessment (SHMA, EB056), which looked at population prevalence of different support needs, including mental health, learning disabilities and autistic spectrum, drug and alcohol misuse, rough sleepers, domestic abuse and care leavers. This study and interviews with Newham Commissioners set out some of the challenges with assessing the need for supported accommodation in the borough, noting the need for a more strategic approach to accommodation delivery (see paragraph 6.98, p.93).

5.6 To help address these issues, Newham's Adult Social Care team is currently developing a ten-year supported accommodation strategy that covers a broad range of specialist housing needs, based on local-level data and experience of good practice. This document aims to provide a comprehensive understanding of specialist accommodation needs in the borough and will inform Officers assessments against the emerging Local Plan policy. Officers are also able to refer to latest Market Position Statements on need, set out on Newham's website [Source: Market Position Statements – Market Shaping – Newham Council]. Importantly, Policy H6 as drafted contains sufficient flexibility to effectively adapt to long-term commissioning plans and relevant sub-regional strategies.

H7 Specialist housing for older people

Q6.6 Is policy H7 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for specialist housing for older people? In particular:

- a) The locational requirements in part 1(b).
- b) The requirement in part 1(c) to provide affordable housing in accordance with policy H3 (other than in care home schemes).

Council Response:

6.1 (a) Yes. These requirements have been formulated based on the advice of relevant commissioning teams within the Council. Further details setting out the justification for the policy can be found in the Housing for older people Topic Paper that supports the plan (TP004, pp.12-13). The section of the topic paper covering 'Location of accommodation' sets out the justification for the policy position, noting social benefits of easy access to town centres for those with limited mobility who reside in extra care and sheltered housing. This approach also accords with the priorities set out in Newham's Aging Well Strategy. To help ensure the effectiveness of this requirement, the policy allows for exceptions where evidenced discussions with relevant Newham commissioning teams suggests the alternative location is appropriate.

6.2 The policy approach also supports the London Plan H13.A2 (EB001, p.198) requirement for specialist older persons housing to well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport. Ensuring proximity to town centre locations helps to ensure residents have access to this infrastructure.

6.3 (b) Yes. The response to Q6.2(a) above sets out the rationale for the affordable housing target set out in Policy H3 of the plan. This target is supported by Newham's relevant commissioning teams for specialist older persons housing, and the Housing for older people Topic Paper [TP004, p.14] that supports the plan sets out in further detail the economic challenges that Newham residents face, in particular:

- recent survey work undertaken as part of the Authority's Ageing Well Strategy suggests that around a fifth of residents surveyed aged over 50 found housing costs difficult to afford and 15 per cent very difficult to afford.
- 2019 Healthy Aging Profile data for Newham, produced by the Officer for Health Improvement and Disparities showed that as of 2019, 37.3 per cent of Newham's residents aged 60 and over were living in poverty. This equated to just under 12,550 people.

6.4 The principle of requiring sheltered and extra care schemes to provide affordable housing is also supported by London Plan Policy H13.B.1 [EB001, p.198], which requires these forms of accommodation to provide affordable housing in accordance with general needs affordable housing targets.

6.5 Based on the above evidence we consider the policy requirement is effective, justified and accords with the requirements of the London Plan.

H8 Purpose built student accommodation

Q6.7 Is policy H8 justified, consistent with the London Plan and will it be effective in helping to meet the identified need for purpose built student accommodation in appropriate locations? In particular:

- a) The requirements in part 1 relating to proposals in the Stratford and Maryland neighbourhood.
- b) The requirements in part 2 relating to proposals elsewhere in the borough.
- c) The requirement in part 3 for at least 60% affordable housing.
- d) The requirements in part 4 relating to nomination agreements.
- e) The requirement in part 5 for the provision of ancillary communal space and sporting facilities.

Council Response:

7.1 (a) Newham has produced H8: Purpose-Built Student Accommodation Topic Paper (TP003) to set out the why the requirements of Policy H8 are considered to be justified, effective and consistent with the London Plan. The justification for part 1 of the policy is primarily discussed section 5.3 of the topic paper (pp.20-24), as well as the policy's justification text

7.2 To summarise the Topic Paper's conclusions, Table 1 of the Topic Paper demonstrates that the vast majority of approvals and resolutions to grant purpose-built student accommodation (PBSA) are located in the Stratford and Maryland neighbourhood (7,922 bedspaces out of a total 9,384 bedspaces since 2019/20 – TP003, pp.9-10). While such accommodation can meet the needs of students attending institutions in travelling distance of the area, there is a concern that level of accommodation delivered to date is undermining the delivery of general needs housing in the neighbourhood.

7.3 The Local Plan is required to reflect the housing needed for different groups in the community as per paragraph 63 of the National Planning Policy Framework. Newham's latest housing trajectory (attached to this response - Housing Trajectory FY2024.25 EXAMINATION PINS) shows that 10,931 general needs homes are planned to be delivered over the proposed housing target period in Stratford and Maryland (2027/28 – 2041/42). This is over a fifth of all general needs housing delivery forecast over the plan period (21%) projected to be delivered in a single neighbourhood. It is therefore imperative to ensure that housing delivery in this neighbourhood delivers sufficient general needs homes to ensure we don't undermine our ability to address the highest housing needs in the borough, namely for family and affordable housing (which represent 59% and 53% of need respectively – EB056, Figure 51, p.67). While it is assumed that PBSA delivery is likely to free up housing for general needs, there is no guarantee freed up homes will meet the needs of the many residents in Newham requiring access to affordable or family

homes, especially as these residents will be competing against sharers who can afford higher rents.

- 7.4 The full rationale for the policy approach in part 1 of the policy is set out in Section 5 of the H8: Purpose-Built Student Accommodation Topic Paper (TP003, pp.13-37). We consider the policy strikes the correct balance between ensuring general need accommodation delivery is not undermined in areas of overconcentration, such as Stratford and Maryland neighbourhood, while ensuring the plan supports PBSA delivery outside of these areas in well-connected locations supported by sufficient infrastructure.
- 7.5 (b) The full rationale for the policy approach in part 2 of the policy is set out in the H8: Purpose-Built Student Accommodation Topic Paper (TP003) that supports the plan. This policy clause is principally covered in section 5 of the topic paper (pp.13-29).
- 7.6 In summary, the policy approach to Purpose-Built Student Accommodation (PBSA) builds upon the London Plan Policy H15 (EB001, pp.206-207) and the guidance set out within the PBSA LPG [Source: [Purpose Built Student Accommodation LPG post consultation](#)]. The policy approach is based on analysis of existing PBSA delivery in the borough's Local Plan housing trajectory and evidence of housing need set out in Newham's Strategic Housing Market Assessment. Part 2 of the policy is positively prepared to meet need for PBSA accommodation across the plan period, supporting delivery of PBSA in well-connected town and local centres. In areas that have seen over-concentration of PBSA delivery, the policy approach seeks to support existing campus expansion while also ensuring that speculative PBSA delivery does not undermine the provision of general needs housing to meet the most pressing housing needs in the borough. The policy also seeks to avoid any associated over-densification of existing isolated PBSA developments in areas of overconcentration, as per part d of the policy.
- 7.7 The oversaturation criteria are clearly defined in the policy's implementation text and based on appeal decisions adapted for the Newham context, as set out in Table 5 of the topic paper (pp.26-28).
- 7.8 To improve clarity of the policy, noting responses to the policy during the Regulation 19 Draft Submission Local Plan consultation, modifications to the policy and supporting text are proposed within the topic paper. These are set out between paragraphs 5.3.24-5.3.25 of the topic paper (pp.32-36), and are proposed to:
- clarify that expansion of campus developments also relates to approved campuses, under policy parts 1.a, 2.a, 2.d, 4.c and 5;
 - amend references to over-saturation to over-concentration, to more closely reflect terminology in the PBSA LPG;
 - clarify that the overconcentration threshold 300 metre radius is measured from the proposal site only; and
 - clearly define the terms adjacent and campus.
- 7.9 These modifications are also set out in the Schedule of proposed text modifications to the Regulation 19 Draft Submission Local Plan under references MO66.1, MO67.1, MO67.2, MO66.2, MO67.3, MO67.4 and MO67.5 (SD004, pp.42-47).

- 7.10 (c) The full rationale for the policy approach in part 3 of the policy is set out in the H8: Purpose-Built Student Accommodation Topic Paper (TP003) that supports the plan. This policy clause is principally covered in section 5 of the topic paper (pp.29-31).
- 7.11 Our proposed target for affordable student accommodation aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation. The target in policy H8 both seeks to meet the needs of student requiring affordable housing, while also ensuring there is no financial incentive for developers to deliver PBSA over affordable housing as a result of differing affordable housing requirements. The topic paper through paragraphs 5.3.18-5.3.20 (pp.30-31) sets out further context around the affordability challenges students in London face, affecting their wellbeing, academic performance, and social mobility.
- 7.12 While our affordable housing requirements for PBSA differ from the London Plan, the policy 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
- 7.13 (d) The full rationale for the policy approach in part 4 of the policy is set out in the H8: Purpose-Built Student Accommodation Topic Paper (TP003) that supports the plan. This policy clause is principally covered in section 6 of the topic paper (pp.38-42).
- 7.14 We consider the policy is positively prepared to meet the needs of students studying in the borough, the majority of whom study at existing larger HEPs in the borough, namely University College London and University of East London (TP003, paragraph 4.4, pp.11-12). The nomination agreement requirements in the policy help to ensure that accommodation delivery meets the needs of the local student population, as speculative developments risk accommodation failing to be occupied upon construction.
- 7.15 The justification for this policy approach links to the broader rationale for the policy requirements to prevent further overconcentration of PBSA in the borough. The nomination requirements flow from this policy expectation, meaning that in areas of overconcentration, nomination agreement requirements ensure PBSA delivery should support local campus-based expansion. The policy also ensures that PBSA secured within or adjacent to university campus developments is occupied by the students of the adjacent HEP, securing the benefits to this student population. Outside of areas of overconcentration, the requirements of policy H8.4.a are positively prepared to meet a broad range of accommodation needs, including from institutions outside the borough. This approach accords with the London Plan policy H15 A.3, with the cascade mechanism for direct lets for accommodation in the implementation text drawn from the PBSA LPG [Source: Purpose Built Student Accommodation LPG post consultation, pp.18-20].
- 7.16 (e) The policy requirement builds upon and is in conformity with the requirements of the London Plan and the PBSA LPG, namely that the design and space in PBSA should provide for different student needs, including study and exercise (TP003, paragraph 7.1.4, p.44). The policy is positively prepared to meet the diverse design needs of students, contributing to improved physical and mental health aligned with the Local Plan's objectives and should help address the sharp rise in mental health issues reported by students in the past decade (TP003, paragraph 7.1.5, p.44). It will also ensure students have convenient access to study spaces to support their learning.

- 7.17 The full rationale for the policy approach in part 5 of the policy is set out in the H8: Purpose-Built Student Accommodation Topic Paper (TP003) that supports the plan. This policy clause is principally covered in section 7.1 of the topic paper (pp.43-45).

H9 Houses in multiple occupation and large-scale purpose built shared living

Q6.8 Is policy H9 justified, consistent with the London Plan and will it be effective in helping to meet the identified need for shared accommodation in appropriate locations? In particular:

- a) The requirements in part 3 making provision for affordable homes.
- b) The locational requirements in part 4.
- c) The requirement relating to the inclusion of main town centre uses and community facilities in part 6.

Council Response:

- 8.1 a) Yes. The response to Q6.2 above sets out the rationale for the affordable housing target set out in Policy H3 of the plan. As per this response, Newham's Strategic Housing Market Assessment (SHMA) set outs that the majority of Newham's affordable housing need is for social rent homes (EB056, Figure 48, p.64 and Figure 51, p.67). Therefore, part 3 of policy H9 sets out that where large-scale purpose-built shared living is provided as part of a block or phase within a larger development, developers are expected to deliver affordable housing that meets the requirements of Local Plan Policy H3. This helps to ensure that affordable housing delivery is prioritised in line with the borough's housing need.
- 8.2 Developments of Large-Scale Purpose-Built Shared Living (LSPBSL) housing as the sole residential tenure are required to provide a payment in lieu contribution, which should secure a higher level of affordable housing provision than the 60 per cent target sought by Local Plan Policy H3.1. The target in policy H9.3 both seeks to meet the needs of residents, while also ensuring there is no financial incentive for developers to deliver large-scale purpose-built shared living over on-site affordable housing as a result of differing affordable housing requirements. Securing affordable housing for LSPBSL as cash in lieu aligns with the approach in the London Plan, set out through Policy H16.A9 (EB001, p.211).
- 8.3 Securing cash in lieu payments at a level higher than the plan's strategic affordable housing target reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site and recognising the onus cash in lieu payments place on the Council to deliver these affordable homes to make up for this shortfall.
- 8.4 The policy allows for the submission of a viability assessment in circumstances where developments are unable to achieve the policy targets, thereby ensuring the plan remains effective and deliverable.

- 8.5 b) The locational requirements set out in part 4 of the policy are only applicable to large houses in multiple occupation and large-scale purpose-built shared living, as defined in the Local Plan glossary. The justification for these requirements is set out in policy's justification text. Noting the density of occupation within these forms of housing, these locations can simultaneously:
- provide residents convenient access to supporting infrastructure and facilities they may not be able to access within their home; and
 - mitigate potential amenity implications for this densely occupied form of housing, noting existing higher levels of activity in these locations.
- 8.6 The policy approach also accords with the London Plan policy H16.A (EB001, p.226), which directs large-scale purpose-built shared living development to areas well-connected to local services and employment by walking, cycling and public transport. The Large-scale purpose-built shared living London Plan Guidance clarifies that areas that are likely to be more suitable for LSPBSL include Metropolitan and Major town centres, all areas of PTAL 5 or 6 and Inner London PTAL 4 and other town centres with high or medium growth potential [Source: [Large-scale purpose-built shared living London Plan Guidance - Feb 24](#), p.6]. The approach in part 4 adapts this guidance to the Newham context, noting these locations are required by the policy to be well connected to public transport.
- 8.7 c) For clarity, the plan does not mandate the provision of main town centre uses or social infrastructure as part of LSPBSL. However, the requirement relating to the inclusion of main town centre uses and social infrastructure in part 6 is intended to ensure that main town centre uses or social infrastructure delivered as part of Large-Scale Purpose-Built Shared Living (LSPBSL) developments are accessible to and benefit the wider community. This approach encourages community cohesion and supports infrastructure accessibility where the delivery of high density large-scale purpose-built shared living may place pressure on access to existing infrastructure in the area. The broader principle of delivering public amenities is also encouraged in the Large-scale purpose-built shared living London Plan Guidance, which supports the delivery of restaurants, bars and communal workspace, promoting their use of these by the surrounding local community, and ensuring any employment-space uses complement and strengthen the local economy [Source: [Large-scale purpose-built shared living London Plan Guidance - Feb 24](#), p.5].
- 8.8 The policy's implementation text supports the effectiveness of the requirement by clarifying the definition of suitable locations (those which are defined as acceptable for Main Town Centre uses under Local Plan Policy HS1, Policy HS3 and social infrastructure under Policy SI2). A modification is proposed within the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan to also include policy J1 within this policy list, under modification reference MO68 (SD004, p.48).

H11 Housing design quality

Q6.9 Is policy H11 justified, consistent with the London Plan and will it be effective in helping to achieve high quality, sustainable homes? In particular:

- a) The requirements in part 2(c) and (d) relating to dual-aspect general needs housing.
- b) The requirement in part 2(e) for any ground floor private amenity space to be located away from street-facing facades)
- c) The design requirements and standards for specialist and other non-general needs housing in part 3.
- d) The requirements in part 5 for shared amenity spaces, including play provision, in major residential developments.
- e) The requirement in part 7 relating to the building regulation standards M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings.

Council Response:

9.1 a) These requirements build upon policy D6.C of the London Plan (EB001, p.125), which requires housing development to maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. They align with the Borough Wide Design Principles set out in the Newham Characterisation Study (EB019, p.294), which recommend:

- Buildings should be designed to maximise internal levels of daylight and dual-aspect homes through orientation, articulation and incorporation of breaks in massing. A minimum of two-thirds dual-aspect homes should be targeted in all new developments.
- Single-aspect, north-facing units should be avoided. Along north-facing façades typologies such as gallery-access units, maisonettes or larger through-units should be considered.

9.2 The approach also accords with the Housing Design Standards London Plan Guidance, which through parts B2.3 and C4.1 promote deck access as a typology and require new homes to be dual aspect 'unless exceptional circumstances make it impractical or undesirable'. Part C4.1 also states that 'where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces'. In accordance with this guidance Local Plan policy H11 2.c clearly sets the expectation for family homes to be dual aspect [Source: [Housing Design Standards LPG](#), p.14 & 23].

9.3 To support the implementation and effectiveness of the policy, the implementation text for the policy provides further guidance for where there is a need to deliver one or two-bedroom single aspect homes. These are expected to be generously sized (at least 10 to 15 per cent above the minimum gross internal floor areas standard), shallow in plan (i.e. not too deep) and east or west facing. Where these are proposed, development should set out how these units will benefit from adequate daylight and privacy and how they meet relevant passive design principles, in accordance with the requirements of Local Plan policy CE4.2.

9.4 (b) The Council acknowledges that there was a slight contradiction between policy H11 2.e and supporting text for the policy, which provides guidance for where this scenario is unavoidable. We therefore have proposed a modification to ensure clarity and consistency:

e. **provide an adequate boundary treatment to ground floor street-facing amenity space and locate any ground floor private amenity spaces away from roads that are a source of significant noise, air quality or visual impacts.** ~~street-facing facades.~~

9.5 This is included in the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan under reference MO70 (SD004, p.49).

9.6 This modification is consistent with Newham's Characterisation Study Borough-wide Design Principles, which recommend primary façades and private amenity spaces being set back and buffered from arterial roads (EB019, p.306). The broader approach is consistent with London Plan policy D6's supporting text, which recommends private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation (EB001, P.131). Critically, this policy requirement helps to ensure the usability of resident's amenity space.

9.7 c) The rationale for each requirement, with links to relevant evidence base, is provided in the table below.

Form of accommodation	Design standard	Rationale
Specialist and supported housing	Care Quality Commission criteria or any subsequent updates or replacements where relevant	Legal requirement under the Health and Social Care Act 2008 for regulated activities. See also 'Care Quality Commission (CQC) accreditation' subheading within the Housing for older Topic Paper 2024 (TP004, p.16).
	HAPPI principles where housing is designed for older people	Recommendation of Newham's Adult Social Care Commissioning services. See 'HAPPI principles' subheading in the Housing for older Topic Paper 2024 (TP004, p.15).
	Setting the Standard Temporary Accommodation Inspection Service Ranking of Grades A, B or C, where the housing will provide temporary accommodation.	A requirement of Newham's Temporary Accommodation commissioning teams.
	The Council's Housing Support Approved Accommodation Standards or any subsequent updates or replacements where relevant	Published Newham requirement for accommodation-based support services for residents, utilised by the borough's Adult Social Care teams.
	Providing sufficient space for care workers to undertake	Recommendation of Newham's Adult Social Care team based on good practice.

	personal care in the bathroom and main bedroom, where relevant.	
	Supporting the ability to install telecare if required in the future.	See 'Best practice quality considerations: telecare provision' subheading within the Housing for older Topic Paper 2024 (TP004, p.18).
Specialist housing for older people	Ten per cent of private rooms as wheelchair adapted rooms, including access to a wheelchair-accessible wet room and in line with best practice guidance	Aligns with London Plan Policy H13.B2 (EB001, p.198)
	Sufficient storage space and charging facilities for residents' mobility scooters	Aligns with London Plan Policy H13.B4 (EB001, p.198)
	Pick up and drop off facilities, close to the principal entrance, suitable for taxis (with appropriate kerbs), minibuses and ambulances.	Aligns with London Plan Policy H13.B5 (EB001, p.198)
Extra care housing for older people	Bedrooms that are at least 12m2	Recommendations of Newham's Adult Social Care teams, who will be assessing quality of the accommodation in line with Policy H6.2.a.
	Living areas at least 20m2 in size	
	Enough space for residents to move around comfortably and accommodate their belongings;	
	A layout that is easy to navigate	
	A variety of communal spaces for residents to socialise and relax.	
Older persons' care homes	Should incorporate dementia friendly design.	Reflects requirements under London Plan Policy H13.A3 (EB001, p.198)
Purpose-built student accommodation	Ten per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice.	Modification is proposed in the Schedule of proposed text modifications to the Regulation 19 Draft Submission Local Plan (SD004, MO71, pp.49-50) to align this requirement with the GLA's Purpose-built Student Accommodation London Plan Guidance. [Source: Purpose Built Student Accommodation LPG post consultation , Box 3, p.12)
	15 per cent of new bedrooms to be accessible rooms in accordance with the	

	requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice.	
Houses in multiple occupation and largescale purpose-built shared living	Have evidenced regard to Newham and Pan-London Private Sector Rental Licensing benchmark criteria	It is a requirement for all privately rented homes in Newham to secure a licence.
	Ensure all private rooms, internal kitchen and communal facilities have openable windows to allow for adequate access to daylight, sunlight and ventilation in habitable spaces	To ensure adequate amenity and passive ventilation for residents.
	Provide a minimum of 1m2 built in storage per resident in either private rooms or communal areas	To ensure residents have sufficient space to store personal belongings, noting they have access to smaller private spaces compared to general needs accommodation.
	Provide internal communal space arranged so as to provide sufficient and convenient access for all residents. Internal communal space should meet or exceed the following standards: <ul style="list-style-type: none"> • Up to 100 residents 4m2 per resident • Between 101 and 400 residents 3m2 per additional resident above 100 residents • Additional residents above 400 residents 2m2 per additional resident above 400 residents 	This accords with the guidance in Table 3.1 of the GLA's Large-scale purpose-built shared living LPG [Source: Large-scale purpose-built shared living London Plan Guidance - Feb 24 , p.7). A modification is proposed to correct a formatting error in SD002a (SD004, MO72, p.50)
Large-scale purpose-built shared living	Communal kitchens on every floor, with any alternate arrangements required to demonstrate convenient access for residents	To ensure residents have convenient and accessible cooking facilities. This requirement seeks to address guidance provided in the Large-scale purpose-built shared living London Plan Guidance [Source: Large-scale purpose-built shared living London Plan Guidance - Feb 24 , 3.4.1, p.10]

Ten per cent of private rooms as wheelchair adapted rooms in line with best practice guidance	To meet the requirements of London Plan Policy D5 (EB001 p.122) and ensure inclusive design. This requirement seeks to address guidance provided in the Large-scale purpose-built shared living London Plan Guidance [Source: Large-scale purpose-built shared living London Plan Guidance - Feb 24 , 3.11.4, p.13]
Private rooms of between 18-27m ² and wheelchair adapted rooms between 28m ² -37m ²	This accords with the guidance in the Large-scale purpose-built shared living London Plan Guidance [Source: Large-scale purpose-built shared living London Plan Guidance - Feb 24 , 3.11.2 and 3.11.5, p.13]

9.8 In summary, we consider each of these requirements to be both justified and effective, noting they are based on:

- legal requirements;
- recommendations or requirements from Newham commissioning teams; or
- London Plan policy and guidance.

9.9 The implementation text for the policy provides further guidance on the requirements of policy H11.3, thereby improving the effectiveness of the policy. We have also worded the overarching policy clause for developments to have ‘evidenced regard’ to these design standards, noting not all were drafted for implementation in the planning context. This approach will support the effectiveness of the policy’s implementation.

9.10 d) The Council considers policy H11 5 to be justified, effective and consistent with the London Plan. The importance of accessing shared amenity space is evidenced in the Newham Characterisation Study, Chapter 9 Borough wide Design Principles (EB019, p.295) which provides guidance and recommendations for private and shared amenity spaces specific to Newham context. Parts a to c of the policy are based on these guidance and recommendations. Part d is based on the Characterisation Study’s borough-wide design principles relevant to optimising internal residential layouts to mitigate the impacts of poor air quality. This section of the Characterisation Study highlights that external amenity spaces facing onto major routes will always be compromised and underused, even with screening, and should be avoided along all major arterial routes and local and destination routes with higher levels of noise and air pollution (EB019, p.306). Further evidence on green space deficiency in the borough can also be found in Newham Green and Water Infrastructure Strategy (EB061-EB067).

9.11 These requirements also reflect the qualitative design aspects recommended in Table 3.2 of the London Plan for communal outdoor amenity spaces. These include the need to:

- provide sufficient space to meet the requirements of the number of residents
- be designed to be easily accessed from all related dwellings
- be located to be appreciated from the inside
- be positioned to allow overlooking

- be designed to support an appropriate balance of informal social activity and play opportunities for various age groups
- meet the changing and diverse needs of different occupiers.

9.12 Playspace requirements in part H11.5.e require developments to adhere to the London Plan Policy S4, as well as Local Plan Policies GWS5 and, where relevant, D2. To support conformity with the London Plan, we have proposed a modification for the Inspector's consideration through the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan under reference MO73 (SD004, p.50). This modification clarifies that playspace requirements only relate to developments likely to be used by children and young people. Further information regarding the justification and effectiveness of these policies are provided in response to matters Q10.3 and Q12.5.

9.13 e) These policy requirements are justified, effective and consistent with the London Plan. Policy D7 of the London Plan, which requires:

- at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
- all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. (EB001, p.132)

9.14 Policy H11.7 includes these requirements through part a of the policy. Part b of the policy reflects Planning Practice Guidance, which sets out that M4[3](2)(b) requirements should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (Paragraph: 009 Reference ID: 56-009-20150327). Part c of the policy looks to address practical challenges that Newham's Occupational Therapist has reported with delivery of M4[3](2)(b) homes delivered in the borough to date. Challenges that have influenced people's decision not to bid for wheelchair adapted housing include:

- where single bedrooms are provided for disabled children, which do not allow sufficient space for their mobility or assistance.
- access to a single lift leading to concerns that if the lift breaks down it will leave residents stranded at upper levels of a development.
- long corridors without powered doors preventing residents from exiting the development or accessing their blue badge bay.

9.15 Addressing these points helps to ensure the effective delivery of wheelchair accessible units. These policy parts are also in conformity with the principles of Policy D5 of the London Plan, which requires developments to:

- achieve the highest standards of accessible and inclusive design;
- be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;
- be able to be entered, used and exited safely, easily and with dignity for all; and
- be designed to incorporate safe and dignified emergency evacuation for all building users (EB001, p.137).