

**LONDON BOROUGH OF NEWHAM**

**LOCAL PLAN INDEPENDENT EXAMINATION IN  
PUBLIC WRITTEN STATEMENT**

**MAIN MATTER 14:  
TRANSPORT AND INFRASTRUCTURE**

**WE ARE NEWHAM.**

## T1 Strategic transport

Q14.1 Is policy T1 justified, effective and consistent with national policy and the London Plan?

### Council Response:

- 1.1 Yes, Policy T1 seeks to ensure that development in Newham supports and does not compromise the borough's strategic transport network. It directs development to protect existing and future transport infrastructure and support the delivery of strategic transport schemes such as the DLR extension to Beckton Riverside and improvements to Stratford station.
- 1.2 The policy is supported by proportionate and up to date evidence, including the Newham Sustainable Transport Strategy 2024 (EB093) – herein "STS (2024)". It assesses whether there is sufficient capacity within the transport network to support the proposed level of growth in a sustainable way. It identifies where strategic and local interventions are required to deliver sufficient capacity and provides recommendations on further interventions to enable a shift to more sustainable and active ways of travelling. A wide range of national, regional and local documents and guidance were used during the development of the strategy (EB093, page 111–113).
- 1.3 Policy T1 and its implementation text sets out clear requirements, expectations and relevant infrastructure contacts for applicants. It also sets out that the borough is working closely with the Mayor of London, Transport for London (TfL) and neighbouring boroughs on strategic transport improvements such as the DLR extension to Beckton Riverside and improvements to Stratford station – statements of common ground confirm this (SD053, SD063).
- 1.4 Policy T1 is consistent with national and regional planning policy. It aligns with Paragraphs 129 and 108 of the National Planning Policy Framework (NPPF) (2023). Policy T1 is also consistent with policies GG2, T1, T2, T3 and T7 of the London Plan (2021).
- 1.5 TfL state in their Regulation 19 response that "*we [...] welcome the continued support for public transport and active travel improvements, including major projects at Stratford station and potential DLR extensions*" (Reg19-E-013).
- 1.6 Overall, Policy T1 is justified, effective and consistent with national policy and the London Plan (2021) and therefore meets the relevant tests of soundness set out in paragraph 35 of the NPPF.

## T2 Local transport

Q14.2 Is policy T2 justified, effective and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 2 for all major developments to provide or contribute to wayfinding, publicly accessible cycle hire provision and car clubs.
- b) Whether the policy will be effective in meeting the needs of people with disabilities, including through the inter-connection of services.

### Council Response:

- 2.1 Yes, Policy T2 considers infrastructure that developers could deliver and link onto their site, part of a wider transport network. It will improve sustainable transport across the borough, support the delivery of a network of well-connected neighbourhoods and deliver multi-functional benefits for the borough and residents.
- 2.2 The policy is supported by proportionate and up to date evidence, including the STS (2024) (EB093). The STS (2024) is detailed in paragraph 1.2 above.
- 2.3 The STS (2024) (EB093) sets out the transport interventions that are necessary to accompany the delivery of allocations identified in the Local Plan (EB093, pages 99–100), as well as sustainable transport projects that contribute to the objectives of the strategy (EB093, pages 101–107).
- 2.4 Policy T2 takes forward the recommendations and transport interventions that are set out in the STS, with the specific amount of transport improvements provided and/or contributed left to the application stage.
- 2.5 The Council works closely with TfL and its own Highways team to deliver transport improvements, with the Statement of Common Ground with TfL confirming this collaborative relationship. (SD053).
- 2.6 Policy T2 is consistent with national and regional planning policy. It aligns with Paragraph 108, 110 and 128 of the NPPF (2023). Policy T2 is also consistent with policies GG2, T2, T3 and T5 of the London Plan (2021), delivering on the Healthy Streets Approach.
- 2.7 TfL state in their Regulation 19 response that *“We are pleased to note the commitment to a network of well-connected neighbourhoods across the borough, implementation of Low Traffic Neighbourhoods and School Streets, and adoption of the Healthy Streets Approach.”* (Reg19-E-013).
- 2.8 Overall, Policy T2 is justified, effective and consistent with both national and London Plan policy and therefore meets the relevant tests of soundness set out in paragraph 35 of the NPPF.

**a) The requirement in part 2 of Policy T2 for all major developments to provide or contribute to wayfinding, publicly accessible cycle hire provision and car clubs is justified in Newham Sustainable Transport Strategy 2024 (EB093).**

2.9 The recommendations regarding wayfinding, cycle hire and car clubs in the STS (2024) are set out in detail below. The justification text of Policy T2 (SD005, page 368) outlines that the delivery of wayfinding, cycle hire and car clubs are a key part of regional efforts to *“help Londoners use cars less and walk, cycle and use public transport more”*.

2.10 The Council considers that major developments incorporating wayfinding, cycle hire and car clubs will help deliver national, regional and local planning and transport objectives.

### 2.11 Wayfinding

- Wayfinding is supported in the STS (2024) which outlines the importance of wayfinding in helping people *“having a easy and seamless journey experience”*. It notes that in *“some areas of Newham, the layout of streets and buildings can be complex, leading to challenges in finding the shortest and most comfortable route”* (EB093, page 64).
- The STS (2024) recommends the expansion of the London wide wayfinding scheme “Legible London” as well as wayfinding signage for active travel routes (EB093, pages 64–65). These actions follow community consultation, with residents desiring improved wayfinding (EB093, page 42).
- The supporting text of Policy T3 of the London Plan (2021) identifies wayfinding improvements as a way to improve transport in London. TfL has historically sought contributions for wayfinding from major development, following the London Plan (2021).

### 2.12 Cycle Hire

- Cycle hire is supported in the STS, which outlines the benefits of cycle hire to residents and how cycle hire is used. (EB093, pages 65–67)
- The STS (2024) recommends the use of the TfL Cycle Hire scheme, as well as other publicly accessible cycle hire schemes. It also recommends using the planning system and developer contributions to expand the availability of cycle hire (EB093, pages 64–67). These actions follow community consultation, with desire for additional cycle hire facilities from residents, businesses and youth participants (EB093, page 42–43, 45).
- The supporting text of Policy T3 of the London Plan (2021) identifies the expansion of the cycle hire network as a key measure to improve sustainable transport options. In line with this strategic direction, TfL has historically sought financial contributions from major developments to deliver publicly accessible cycle hire facilities.
- This approach is consistent with the London Plan (2021) and supported locally by adopted Newham Local Plan (2018) Policy INF1.b.ix (page 186), which promotes investment in cycling infrastructure to enhance connectivity and active travel.

## 2.13 Car Clubs

- The justification text of Policy CE2 highlights that “*Car clubs are an excellent way to allow occasional vehicle use by residents without encouraging car ownership or continuous car use*” (SD005, page 368). Car clubs are further supported in the STS, which outlines the benefits of car clubs and the borough’s existing provision (EB093, page 85).
- The STS (2024) recommends the expansion of car club provision, in both spatial coverage and the number of vehicles. (EB093, page 85) It promotes the electrification of car clubs to help reduce overall emissions (EB093, page 78). These actions follow community consultation, with residents wishing “*car clubs to be more desirable and viable*”. (EB093, page 42–43, 45)
- The provision of car clubs is consistent with the London Plan (2021) Policy T6.1.D and its supporting text which states “car club spaces can help support lower parking provision and car-lite lifestyles by enabling multiple households to make infrequent trips by car.
- The Council has consistently sought car club provision or financial contributions towards car clubs from developments, proportionate to their scale. This approach aligns with London Plan (2021) policy T6.1.D and adopted Newham Local Plan (2018) Policy SP8.2.a.ix (page 93) and Policy INF2.2.d (page 193).

**b) Whether the policy will be effective in meeting the needs of people with disabilities, including through the inter-connection of services.**

- 2.14 TfL data shows that 95% of bus stops in London are accessible, with all but four stations in Newham offering step-free access.

The STS (2024) (EB093) acknowledges that movement can be hindered by severance caused by water and transport infrastructure (EB093, page 17) and sets out actions to improve accessibility, including:

- Walkable town centres (pages 54–55)
- Reducing severance (page 56)
- Healthy Street audits (pages 61–62)
- Step-free access at bus stops and stations (pages 73–74)
- Accessible EV charging points (pages 77, 79)
- Provision of accessible parking (pages 83–84)
- Maintenance of footways and cycleways (page 88)

- 2.15 Many improvements will be delivered outside the planning process through wider implementation of the STS. However, several site allocations in the Submission Local Plan include infrastructure requirements to reduce severance, such as new footbridges, step-free station access, and enhanced transport links.

- 2.16 Policy T2's justification text states that that *"development should be accessible to all residents, with work to improve access and mobility across the borough including the provision of dropped kerbs at junctions, removal of pavement parking and by ensuring that pavements are free of trip hazards/obstructions"*. (SD005, page 368)

- 2.17 The STS (2024) also commits to streets that are uncluttered, easy to navigate, and suitable for all abilities, including wheelchair users (EB093, page 54).

- 2.18 The Submission Local Plan addresses accessibility through policies on cycle parking for adaptive bikes (Policy T3.4), mobility scooters (Policies T3.1c and T3.5), and blue badge parking as an exception to car-free development (Policy T1.b) (SD005, pages 362–379). Policy D2 further requires inclusive and accessible public realm (SD005, pages 58–68).

- 2.19 The Council considers this policy to be effective in meeting the needs of disabled people. The Equality Impact Assessment (Appendix J, SD007) concluded that transport policies are likely to have a positive effect on older people, disabled people, families with children, women, and those experiencing socioeconomic deprivation (SD007, page J251). The Local Plan's emphasis on overcoming barriers to movement demonstrates that accessibility has been fully considered and addressed.

## T3 Transport behaviour change

Q14.3 Is policy T3 justified, effective and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 1 for all new development to be car free (apart from the stated exceptions).
- b) The statement in part 2 that development that proposes a drive-through will not be supported.
- c) The requirement in part 4 (f) for all major employment development to include facilities for washing and changing.
- d) The requirement in part 6 (a) for any new development that includes parking to provide EVCP on residential spaces.
- e) The requirement in part 6 (c) for major developments with zero parking on site to provide contributions towards EVCPs in other parts of the borough.
- f) The thresholds for transport assessments in part 7 and Table 15 having regard to national planning guidance.

### Council Response:

- 3.1 Yes. Policy T3 seeks to discourage private vehicle use, promote zero-emission mobility and increase active travel. This is essential for achieving Newham's modal share target, which requires a significant behavioural shift towards public transport and active travel.
- 3.2 The policy is underpinned by proportionate and up-to-date evidence, notably the STS (2024) (EB093). This evidence addresses:
  - Changing facilities at workplaces (page 39),
  - Secure cycle parking (pages 40, 43, 58),
  - Car-free development (page 78),
  - Safe charging for e-bikes and mobility scooters (page 79),
  - Electric Vehicle Charging Points (EVCP) design, accessibility, and developer contributions (pages 77–80, 93),
  - Mobility scooter parking (page 83),
  - Deliveries and servicing (page 78), and
  - Taxi ranks (page 86).
- 3.3 The policy is also informed by wider guidance, including the Mayor's Transport Strategy (2018), Newham's emerging Streetscape Design Guide, and Newham's Local Implementation Plan.
- 3.4 Implementation requirements are clearly set out, covering parking, cycle parking, EVCP provision and contributions. Delivery will be supported through planning conditions, Travel Plans and developer contributions, in collaboration with TfL and Newham's Highways team. This collaborative approach is confirmed in the Statement of Common Ground with TfL (SD053).
- 3.5 Policy T3 is consistent with national and regional planning policy. It aligns with paragraphs 108, 110, 111 and 128 of the NPPF (2023).

It is consistent with the London Plan (2021), particularly Policy T1, which supports the Mayor's strategic target of 80% of trips by sustainable modes by 2041. It should be noted that Newham's mode share target is 83 per cent. Policy T3 also aligns with London Plan policies GG2, T2, T3, T5, T6 and T7, supporting modal shift and behaviour change.

3.6 TfL state in their Regulation 19 response that "*We strongly support the requirement for all development to be car free and also welcome the addition of references to locally specific mode share targets and the Mayor's Vision Zero road safety objective.*" (Reg19-E-013).

3.7 Overall, Policy T3 is justified, effective and consistent with both national and London Plan policy and therefore meets the relevant tests of soundness set out in paragraph 35 of the NPPF.

**a) The requirement in part 1 for all new development to be car free (apart from the stated exceptions).**

3.8 Paragraph 112 of the NPPF (2023) sets a clear national policy basis for limiting car parking in highly accessible areas.

3.9 The London Plan (2021) builds on this approach. Policy T6 (Car Parking) establishes that "*car-free development should be the starting point for all development proposals in places that are [...] well-connected by public transport*" (Policy T6.B). This principle applies across inner London boroughs, including Newham.

3.10 The London Plan (2021) also sets maximum parking standards for different uses and confirms that lower local standards should apply where specified. Newham's Submission Local Plan adopts this approach, reflecting its inner London context.

3.11 Evidence supports this requirement. Census 2021 data shows that 51.7% of households in Newham do not have a car. The STS (2024) (EB093) confirms that Newham has one of the lowest car ownership levels in London and sets out the Council's ambition to reduce this further, given the negative impacts of car dependency on air quality, congestion and road safety (EB093, pages 9–10, 19).

3.12 Residential

- The London Plan (2021) sets residential car parking policy in Policy T6.1 – requiring car-free residential development (other than disabled persons' parking) in Inner London Opportunity Areas.
- The majority of residential development proposed in the Submission Local Plan will be in an Opportunity Area. In inner London outside of Opportunity Areas, the London Plan (2021) does permit parking in areas of low public transport accessibility.
- Following adoption of the London Plan (2021), the London Borough of Newham has applied a borough-wide approach requiring car-free development (other than blue badge parking) for all residential schemes, consistent with the London Plan (2021).



- The STS (2024) (EB093) assumed car-free development in its transport modelling (page 26) and includes actions to encourage car-free growth (page 78).
- Accordingly, Policy T3.1 of the Submission Local Plan adopts a position of car-free development, other than blue badge parking, for all residential development.

### 3.13 Employment and town centres uses

- The London Plan (2021) sets car parking policy in Policy T6 and sets parking standards for employment and town centres uses in policies T6.2, T6.3 and Policy T6.4.
- Policy T3.1 of the Submission Local Plan continues the approach taken by the borough to pushing for car-free development where appropriate considering specific uses.
- The Employment Land Review (2022) identifies a demand for industrial land. Alongside Strategic Industrial Land (SIL) and Local Industrial Locations (LIL), Policy J1.2 supports industrial floorspace to be located on *“retail and leisure parks with good accessibility to the Strategic Road Network”*.
- The STS (2024) (EB093) highlights that Newham is unique among London boroughs, with strategic industrial land close to the Central Activity Zone (page 91). The west and south of the borough are key locations for logistics and industry (page 23). However, these areas lack night bus services, despite shift work being common (page 73).
- The supporting text of Policy T6.2 of the London Plan (2021) states that *“For industrial sites, the role of parking – both for workers and operational vehicles – varies considerably depending on location and the type of development proposed. Provision should therefore be determined on a case-by-case basis.”*
- To support industrial development, the Council considers that a limited quantity of car parking could be justified for employment use and town centre uses – depending on the hours of operation, shift patterns, employment density and PTAL of the site, while seeking the lowest possible quantity of parking.
- The Council has previously applied this approach to the conversion of retail and leisure parks to industrial use, where applicants justified car parking to officers' satisfaction.
- SEGRO – a property developer that specialises in industrial and logistics sites – supported this approach in their Regulation 18 representation, stating *“supporting text [...] acknowledges that a quantity of car parking may be justified for industrial development due to hours of operation/shift patterns/PTAL etc. as reflected in the London Plan. This is an extremely important point.”* (Reg18-E116)

### 3.14 Blue badge parking

- The London Plan (2021) addresses parking for disabled persons in Policy T6.1 for residential uses, and Policy T6.5 for non-residential uses.
- Policy T3 of Submission Local Plan requires that blue badge spaces in line with London Plan (2021) standards, proportional to the development and the quantity of existing blue badge spaces in the local area. (SD005, page 375)
- Policy T3.1.c of the Submission Local Plan states that *“mobility scooter parking [for residential development] may be considered appropriate instead of additional blue badge spaces in areas of the borough with high levels of public transport accessibility and close to accessible stations”*
- This approach is supported by the STS (2024) (EB093), which considers the availability and provision of blue badge parking and mobility scooter parking (EB093, pages 83–84).

### 3.15 Short term operational bays

- Policy T6 of the London Plan (2021) requires that *“adequate provision should be made for efficient deliveries and servicing and emergency access”* and *“development proposals should facilitate safe, clean, and efficient deliveries and servicing”*. Policy T6.2 adds that *“Operational parking requirements [for office uses] should be considered on a case-by-case basis”*.
- Policy T7.B of the London Plan (2021) states that *“freight strategies [should seek to] reduce road danger, noise and emissions from freight, such as through the [...] provision of rapid electric vehicle charging points for freight vehicles”*.
- Policy T3.1.d of the Submission Local Plan states that *“Short term operational bays allocated for specific uses – such as deliveries, servicing, pick up/drop off, taxi ranks and short term visitor parking – will be supported only where need for the bays is evidenced”*. (SD005, page 372)
- This approach is supported by the STS (2024) (EB093), which addresses a borough-wide parking strategy (EB093, page 81), the availability and provision of taxi bays (EB093, page 86), deliveries and servicing (EB093, pages 91-92) and loading bays (EB093, page 95). This follows widespread community consultation, with businesses expressing a desire for more parking for business trips and noted the “challenges in completing deliveries due to parking restrictions” (EB093, pages 37 and 39).
- The Greater London Authority (GLA) stated in their Regulation 19 response that *“the requirement for all development to be car free is strongly supported”* (Reg19-E-015), with TfL stating in their Regulation 19 response that *“we strongly support the requirement for all development to be car free”*. (Reg19-E-013).

**b) The statement in part 2 that development that proposes a drive-through will not be supported.**

- 3.16 Drive-throughs are services that let people order and collect food and/or drink without needing to leave their cars. Drive-throughs are considered ancillary to the wider use – such as Class E (cafes and restaurants) or sui generis (hot food takeaways). Between 2015 and 2020, the number of drive-throughs in the UK increased by over 40%, with further growth because of the COVID-19 pandemic.
- 3.17 Paragraph 90 of the NPPF (2023) directs main town centre uses—including restaurants, cafés and hot food takeaways—to town centre locations. The NPPF glossary explicitly identifies “drive-through restaurants” as a main town centre use.
- 3.18 As noted in paragraph 3.11 above, Census 2021 data shows that most Newham households do not own a car. Despite this, the borough experiences high traffic congestion (EB093, pages 9–10, 19). Drive-throughs are inherently car-centric, encouraging short car trips and conflicting with national, regional and local policy objectives to promote modal shift to walking, cycling and public transport.
- 3.19 The Council seeks to discourage retail parks that primarily attract car-borne customers. High Street policies in the submission Local Plan continue the NPPF’s town centre first approach, supporting the loss of Class E uses in out-of-centre retail parks (SD005, page 143). No evidence shows that the drive-through model is necessary to meet retail, leisure or food and beverage demand in Newham.
- 3.20 Drive-throughs represent an inefficient, low-density land use. Vehicle circulation and queuing lanes require far more land than high street cafés or restaurants. Car-oriented development undermines the delivery of high-quality, walkable neighbourhoods.
- 3.21 Paragraph 128 of the NPPF (2023) and policies GG2, D3 and T1 of the London Plan (2021) require development should make efficient use of land.
- 3.22 Given the high demand for housing and industrial land identified in the Newham Strategic Housing Market Assessment 2022 (EB056) and Employment Land Review (EB048), drive-throughs do not represent an efficient use of land and therefore will not be supported.
- 3.23 Newham already experiences poor air quality, with safe levels of Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>) exceeded across the borough. Transport is a major contributor, with higher concentrations correlating with major roads. This is evidenced by the STS (2024) (EB093, page 7) and the Newham Air Quality Action Plan 2019–2024.
- 3.24 Drive-throughs exacerbate this issue by requiring prolonged vehicle idling. Research from the University of Coventry indicates [“levels of nitrogen dioxide and particulate matter peaking at many times the standard permissible limit”](#) adjacent to drive-through facilities. The Council therefore considers that drive-throughs would worsen air quality and harm residents’ health.

- 3.25 From a public health perspective, drive-throughs are typically associated with hot food takeaways selling energy-dense, nutrient-poor food. The supporting text to Policy E9 of the London Plan (2021) states *“Hot food takeaways generally sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables. There is evidence that regular consumption of energy-dense food from hot food takeaways is associated with weight gain”*. Health experts recommend restricting such uses to create healthier food environments.
- 3.26 Policy HS6 of the Local Plan reflects these concerns, noting that residents remain worried about the concentration of hot food takeaways. Planning policy since 2016 has successfully restricted further clustering and contributed to improved health metrics in parts of the borough (SD005, page 157).
- 3.27 Drive-throughs can also harm residential amenity, creating hostile environments through littering, engine noise and vehicle idling.

**c) The requirement in part 4 (f) for all major employment development to include facilities for washing and changing.**

- 3.28 [Research by UCL](#) indicates that the absence of secure bike parking and shower and changing facilities at workplaces is a significant barrier to cycling to work.
- 3.29 The adopted Local Plan (2018) states that *“High quality cycle facilities should be provided in line with the standards set out in the London Plan, and local context [...] including where appropriate associated facilities and for washing and changing facilities.”* (page 193) The supporting text of London Plan (2021) Policy T5 reinforces this, recommending that places of employment provide supporting facilities such as changing rooms, lockers, maintenance areas and showers.
- 3.30 Policy T2.4(f) of the Submission Local Plan builds on these requirements by requiring washing and changing facilities for major employment development. This is supported by the STS (2024) (EB093), which identifies cycle parking and changing facilities as key actions to encourage active travel, based on consultation with businesses (page 39)

**d) The requirement in part 6 (a) for any new development that includes parking to provide EVCP on residential spaces.**

- 3.31 Policy T6.1.D of the London Plan (2021) states: *“All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles”*. Paragraph 111 of the NPPF (2023) similarly requires local parking standards to ensure *“adequate provision of space for charging plug-in and other ultra-low emission vehicles”*.
- 3.32 Policy T3.1 of Submission Local Plan requires that development should provide a quantity of blue badge spaces in line with London Plan (2021) standards. They should be proportionate to the scale and nature of the development and the quantity of existing blue badge spaces in the local area. (SD005, page 375)
- 3.33 As noted in paragraph 3.11 above, Newham has one of the lowest levels of car ownership in London and seeks to reduce this further due to the negative impacts of car dependency, including poor air quality, congestion and road safety.

- 3.34 However, the STS (2024) recognises that EVs offer significant benefits, including reduced tailpipe emissions, lower operational costs and quieter operation, contributing to improved air quality and reduced noise pollution (EB093, page 76). It also highlights substantial demand for EV charging infrastructure, noting TfL's estimate that London will require 60,000 charging points by 2030, including 4,000 fast chargers (EB093, page 16).
- 3.35 Considering this, the STS (2024) encourages uptake of zero-emission vehicles only where residents require a car, recommending prioritisation of EV charging infrastructure in on-street Blue Badge bays and visitor parking (EB093, page 80).
- 3.36 Delivering a sustainable EV charging network will ensure that transport and servicing needs are met while supporting the transition to zero-emission vehicles.
- 3.37 Accordingly, Policy T3.6 of the Submission Local Plan requires 100% of Blue Badge spaces to be equipped with EV charging points. The Council considers this requirement justified by the evidence in the STS (2024) and consistent with the NPPF (2023) and London Plan (2021).

**e) The requirement in part 6 (c) for major developments with zero parking on site to provide contributions towards EVCPs in other parts of the borough.**

- 3.38 Policy T6.E of the London Plan (2021) states: "*provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles. All operational parking should make this provision, including offering rapid charging*". Paragraph 111 of the NPPF (2023) similarly requires local parking standards to ensure "*adequate provision of space for charging plug-in and other ultra-low emission vehicles*"
- 3.39 As noted in paragraph 3.11 above, Newham has one of the lowest levels of car ownership in London and seeks to reduce this further due to the negative impacts of car dependency, including poor air quality, congestion and road safety.
- 3.40 As set out in paragraph 3.35 above, the STS (2024) notes that the use of electric vehicles can deliver reduced tailpipe emissions, quieter operation and lower operating cost compared to fossil fuel powered vehicles.
- 3.41 The STS (2024) highlights that EVs deliver reduced tailpipe emissions, quieter operation and lower running costs compared to fossil fuel vehicles (EB093, page 76). It notes substantial demand for EV charging infrastructure, citing TfL's estimate that London will require 60,000 charging points by 2030, including 4,000 fast chargers (EB093, page 16). National policy also mandates that all new vans will be zero-emission by 2035 and all new HGVs by 2040.
- 3.42 The STS (2024) (EB093) recommends actions such as:
- Collaborating with developers to expand the on-street charging network (page 77),
  - Supporting zero-emission transition for high-mileage and essential service vehicles (page 78), and
  - Ensuring contributions from car-free developments are assessed based on direct benefit and local need (page 80).
- 3.43 These actions follow widespread community consultation, with residents expressing a need for "*more rapid charging points in the borough*", with businesses expressing a desire for

more electric vehicle charging points, stating “*EV chargers should be provided for taxis and other high use vehicles*” (EB093, pages 42–43).

- 3.44 Despite low car ownership and long-standing car-free policies, residents will still receive deliveries and visitors, and these trips should be zero-emission. Policy T3.6 therefore requires major car-free developments to contribute towards EVCP provision elsewhere in the borough. This will help deliver a sustainable charging network, ensuring servicing and transport needs are met while supporting the transition to zero-emission vehicles.

**f) The thresholds for transport assessments in part 7 and Table 15 having regard to national planning guidance.**

- 3.45 Paragraph 117 of the NPPF (2023) states: “*all developments that will generate significant amounts of movement [...] should be supported by a transport statement or transport assessment so that the likely impact of the proposal can be assessed*”.
- 3.46 Policy T4 of the London Plan (2021) states: “*when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed*”.
- 3.47 London Plan (2021) Policy T4 indicates that TfL guidance on transport assessments should be followed.
- 3.48 The thresholds for transport assessments in Policy INF2 of the adopted Local Plan 2018 were based on TfL’s 2007 guidance. Although this national guidance has since been withdrawn, transport colleagues confirm that these thresholds have worked well in practice.
- 3.49 Policy T3.7 of the Submission Local Plan retains these established thresholds, updated to reflect recent use class changes.
- 3.50 The Council is aware that TfL intends to update transport assessment thresholds in future and will review its approach accordingly.

## T4 Servicing and development

Q14.4 Is policy T4 justified, effective and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 4 for all development to be designed to enable and encourage servicing using sustainable means, such as using zero emission vehicles and/or cargo bikes.
- b) The requirement in part 5 for developments that service and/or deliver to other locations to ensure that these journeys are undertaken by zero emission vehicles or cargo bikes for 'last mile' journeys

### Council Response:

- 4.1 Policy T4 sets out how servicing and deliveries in the borough should be managed, to support Newham's sustainable transport objectives.
- 4.2 The policy is supported by proportionate and up-to-date evidence, including the STS (2024) (EB093), which recognises that *"residents and businesses rely on delivery and servicing vehicles to provide them with the goods and services they need in their daily lives"* (EB093, page 91).
- 4.3 Over the last 20 years, online shopping and home deliveries have grown substantially, as evidenced by the Retail and Leisure Study 2022 (EB029) and Policy HS7 justification text (EB029, pages 23–25; SD005, pages 160–161). This helped to drive a sharp rise in light goods vehicle use in London. (EB093, page 91).
- 4.4 Newham is unique among London boroughs, with strategic industrial land close to the Central Activity Zone, making it a key location for freight consolidation and last-mile delivery into central and inner London (EB093, page 91).
- 4.5 As population and demand for deliveries increase, pressure on limited road space will intensify. Goods vehicles are larger and heavier than other vehicles, creating greater noise, air pollution and road danger (EB093, page 91)
- 4.6 The STS (2024) sets out three principles for sustainable and efficient delivery and servicing – reduce, remode, retime & manage (EB093, pages 91–92).
- 4.7 Policy T4 implements these principles, addressing safety, construction logistics, zero-emission vehicles and cargo bikes, and development that delivers to other locations.
- 4.8 Policy T4 is supported by related policies in the Submission Local Plan (SD005):
  - T3.1(d): Short-term operational bays for deliveries and servicing.
  - T3.6(b): EV charging points for 20% of delivery bays.
  - T3.6(c): Funding for a borough-wide EV charging network.
- 4.9 Delivery will be secured through mechanisms such as Servicing and Deliveries Management Plans, Demolition and Construction Logistics Plans, Transport Assessments and Travel Plans.

4.10 Policy T4 is consistent with national and regional planning policy. It aligns with paragraphs 109 and 116 of the NPPF (2023). It is also consistent with London Plan (2021) policies GG2, T3, T6 and T7.

4.11 Overall, Policy T4 is justified, effective and consistent with national policy and the London Plan, meeting the tests of soundness in paragraph 35 of the NPPF.

**a) The requirement in part 4 for all development to be designed to enable and encourage servicing using sustainable means, such as using zero emission vehicles and/or cargo bikes.**

4.12 Policy T7 of the London Plan (2021) states that *“development plans and development proposals should facilitate sustainable freight movement.”* The supporting text to Policy T7 explains that the policy seeks to enable sustainable freight movement through consolidation, modal shift, and promoting deliveries at different times of day and night to reduce congestion, improve air quality, and minimise conflict with other users.

4.13 As noted in paragraph 4.3 above, online shopping and home deliveries have grown substantially over the last 20 years, increasing the need for efficient and sustainable servicing solutions.

4.14 Paragraph 3.11 above highlights that Newham has one of the lowest levels of car ownership in London, and the Council aims to reduce this further due to the negative impacts of car dependency, including poor air quality, congestion, and road safety concerns. Paragraph 3.57 above sets out the benefits of electric vehicles.

4.15 The STS (2024) encourages uptake of zero-emission vehicles where vehicles are essential, such as for deliveries and servicing. Actions include supporting the transition to zero-emission vehicles for high-mileage and essential service vehicles, including LGVs, HGVs, and tradespeople (EB093, page 78).

4.16 Furthermore, the STS (2024) states that *“where possible, delivery and servicing requirements will be met by more sustainable modes, including use of the river, e-cargo bikes (or e-quads), pedestrian couriers, and small electric vehicles”* (EB093, page 92). It also encourages businesses to switch to cleaner modes of transport (EB093, page 94).

4.17 In light of this, Policy T4.4 of the Submission Local Plan requires development to be designed to enable and encourage servicing using sustainable means, including zero-emission vehicles and/or cargo bikes. This requirement operationalises London Plan (2021) Policy T7 at the borough level and is supported by complementary policies:

- Policy T3.1.d – short-term operational parking for deliveries and servicing
- Policy T3.6.b – provision of Electric Vehicle Charging Points at 20% of delivery parking bays
- Policy T3.6.c – funding to build a borough-wide network of Electric Vehicle Charging Points.



4.18 The Council considers this requirement justified by the evidence in the STS (2024), consistent with the approach set out in the NPPF (2023) and the London Plan (2021). It is positively prepared, justified, and effective in supporting sustainable transport objectives, reducing congestion, and improving air quality.

**b) The requirement in part 5 for developments that service and/or deliver to other locations to ensure that these journeys are undertaken by zero emission vehicles or cargo bikes for 'last mile' journeys**

4.19 Policy T7.F of the London Plan (2021) states: *"Development proposals for new consolidation and distribution facilities should be supported provided that they do not cause unacceptable impacts on London's strategic road networks and:*

- 1) reduce road danger, noise and emissions from freight trips*
- 2) enable sustainable last-mile movements, including by cycle and electric vehicle*
- 3) deliver mode shift from road to water or rail where possible (without adversely impacting existing or planned passenger services)."*

4.20 As noted in paragraph 4.3 above, online shopping and deliveries have grown substantially over the last 20 years, increasing the need for efficient and sustainable logistics solutions. Paragraph 3.11 above highlights that Newham has one of the lowest levels of car ownership in London, and the Council aims to reduce this further.

4.21 The STS (2024) encourages deliveries and servicing to be made using more sustainable modes and promotes business uptake of cleaner transport options. It specifically supports the provision of last mile logistics hubs to enable the use of smaller delivery vehicles, including cargo bikes (EB093, page 93).

4.22 Following the London Plan (2021), the Council has taken steps to encourage zero-emission vehicles at industrial sites, demonstrating the feasibility and benefits of this approach. This includes:

- Twelvetreets Cresnet in Bromley by Bow (22/00620/FUL, approved February 2023, completed 2023)
- Showcase Cinema site in Beckton (21/03193/FUL, approved May 2023, completed 2024)
- Gateway Retail Park site in Beckton (23/02637/FUL, approved at Strategic Development Committee May 2025, section 106 agreement pending)
- Bow Goods Yard in Stratford (24/00122/OUT, approved at Strategic Development Committee May 2025, awaiting approval by LB Tower Hamlets and agreement on section 106)
- South Crescent in Canning Town (25/01663/FUL, approved at Local Development Committee November 2025, section 106 agreement pending)

4.23 Policy T4.5 of the Submission Local Plan follows the evidence of the STS (2024) and complies with the approach of Policy T7 of the London Plan (2021), ensuring that sustainable last-mile movements take place.

## T5 Airport

Q14.5 Is policy T5 justified, effective and consistent with national policy and the London Plan?

In particular, will it be effective in supporting the operation of London City Airport and its contribution to the wider economy whilst having due regard to social and environmental factors?

### Council Response:

- 5.1 Yes. Policy T5 is justified, effective, and consistent with national policy and the London Plan. It will be effective in supporting the operation of London City Airport and its contribution to the wider economy, while having due regard to social and environmental factors.
- 5.2 The full policy rationale behind Policy T5 is set out in the London City Airport Topic Paper 2025 (TP005), which:
- sets out the policy context regarding airports, including previous planning decisions at London City Airport, national guidance as well as the airport's own Master Plan (2020) (TP005, pages 8–14).
  - details the transformation of the local area from predominantly industrial to increasingly residential and mixed-use, providing new homes and jobs at a regionally significant scale. (TP005, pages 14–15)
  - sets out the need for a dedicated policy, following feedback from residents, community groups and politicians, as well as to respond to Council strategies and objectives. (TP005, pages 17–21)
  - sets out the justification for the policy approach (TP005, pages 26–42)
- 5.3 Policy T5 is further supported by STS (2024) (EB093) and Employment Land Review (2022) (EB048).
- 5.4 The policy is positively prepared, seeking to balance housing and employment needs, make efficient use of land, and align with the airport's Master Plan (2020) and climate objectives.
- 5.5 Policy T5 supports the airport's positive contribution to the economy. The justification text (SD005, pages 383–384) and Topic Paper (TP005, page 4) notes that London City Airport is:
- One of London's major airports
  - One of the largest private sector employers in Newham
  - A catalyst for investment in East London
  - The Royal Docks and Beckton Riverside Opportunity Area Planning Framework (2023) also identifies the airport as an economic asset (TP005, page 40).
- 5.6 Policy T5 aligns with the airport's Master Plan (2020):
- Policy T5.3 supports efforts to achieve net zero (TP005, page 36)
  - Policy T5.4 supports achieving 80% of journeys to/from the airport by public and sustainable transport (TP005, page 37)
  - Policy T5.5 supports increasing job opportunities at the airport (TP005, pages 40–41).
- 5.7 Policy T5.6 ensures developments do not compromise airport safety (TP005, page 42), supported by Policy T1.1, which protects the airport's ongoing function (SD005, pages 363–

365).

- 5.8 Passenger numbers grew from 1.5 million in 2000 to 5 million in 2019 (TP005, page 4). In 2024, the Secretaries of State partially allowed an appeal, increasing the permitted passenger cap to 9 million annually while retaining restrictions on Saturday afternoon flights (TP005, page 6).
- 5.9 The airport's urban location means planning permissions have always included restrictions and mitigations to protect residential amenity. These include prohibitions on night flights and helicopters (since opening of the airport in 1987) (TP005, pages 32–33) and a respite period from 12:30 Saturday to 12:30 Sunday (since 1998), supported by residents and confirmed as by the 2024 Inspector's report (TP005, pages 30–32).
- 5.10 Development proposals at the airport will be assessed case-by-case, balancing benefits and impacts. Policy T5.2 makes clear that certain changes – such as removing the respite period, introducing night flights, freight aircraft, helicopters, or drones – would cause unacceptable cumulative impacts that cannot be mitigated and therefore should not be supported (TP005, pages 28–35).
- 5.11 Maintaining existing restrictions provides clarity for residents, the airport, developers, and decision-makers, and aligns with London Plan Policy T8, which requires changes to airport operations to take full account of affected communities.
- 5.12 Policy T5 is consistent with national policy and the London Plan (2021), aligning with NPPF (2023) paragraphs 124, 180, and 191, and London Plan Policies T8 and GG2. The GLA has raised no conformity issues with aviation policies in the London Plan (2021).

## W4 Utilities and digital connectivity infrastructure

Q14.5 Is policy W4 justified, effective and consistent with national policy and the London Plan? In particular: a) The requirement in part 1 (b) for all major developments to demonstrate that there is sufficient utility infrastructure capacity both on and off-site to meet the demand of development during the construction and operation phases, taking into consideration the cumulative impact of current and proposed development. b) The requirement in part 6 for all major developments to improve digital connectivity.

### Council's response:

- 6.1 Yes, Policy W4 is justified, effective and consistent with national policy and the London Plan. This policy ensures sufficient provision of utilities infrastructure so that all new developments are adequately connected to and served by essential utilities. This is supported by an Infrastructure Delivery Plan (EB004), which has been prepared with engagement with the infrastructure providers in line with NPPF paragraph 16. The Council will continue to work closely with utilities providers and the Greater London Authority to address infrastructure needs, both within the borough and the wider region. This is in line with NPPF paragraph 20 which requires policy to make sufficient supply of utility infrastructure and specific requirements regarding energy, water and digital connectivity infrastructure in London Plan Policy SI3, SI5 and SI6.
- 6.2 The policy also addresses the impact brought by new development in close proximity to existing infrastructure facilities and networks, or where utilities expansion or new development is proposed near sensitive uses. By requiring the agent of change to minimise amenity and neighbourliness impacts such as noise, odour or visual disturbances through sensitive design, the policy ensures that new developments can coexist with existing infrastructure without negatively affecting residents or the efficient operation of essential utilities. This is consistent with London Plan Policy D13 which focuses on reducing conflicts between land uses. The Council have engaged with Thames Water and surrounding landowners to address odour impacts brought by the Beckton Sewage Treatment Works and this is outlined in the Statement of Common Ground (ED005).
- 6.3 Policy W4 is effective as it requires major developments that are likely to have significant impacts on utility infrastructure to engage with utility providers early in the planning process, addressing potential amenity and capacity issue from the outset. The policy is also future proof, as it mandates that developments provide sufficient ducting space for utilities, ensuring that future infrastructure upgrades can be accommodated. Meanwhile, the Council is working with key stakeholders to address necessary upgrades to infrastructure within the borough, ensuring the policy remains responsive to future growth.
- 6.4 a) Policy W4 Part 1(b) is justified, effective and consistent with the London Plan. All major developments have the responsibility to ensure utilities networks and connections can serve the development ahead of occupation, as well as ensure that there will be no impact on the existing infrastructure assets including water, energy and digital connectivity infrastructure in consistent with London Plan Policies SI3, SI5 and SI6, and paragraph 20 of the NPPF. Applicants must provide information to the Council and utilities providers regarding the needs for delivering utilities infrastructure upgrade to cope with the future developments.

- 6.5 Utility network are interconnected systems, so constraints often occur beyond the site boundary. Therefore, the assessment of both on- and off-site is necessary to monitor additional demand resulted by the proposed development without causing failures or requiring emergency upgrades. Cumulative impact with other anticipated development in the area should also be considered as to prevent placing pressure to the wider system and hindering future growth. These requirements would support coordinated infrastructure planning and avoid piecemeal upgrades.
- 6.6 This policy is proven effective as it is carried from the Local Plan 2018 and continue applying in the Development Management process.
- 6.7 (b) Policy W4 part 6 is justified as it directly addresses the growing need for high-quality digital infrastructure in Newham and support the wider priorities on the national level.
- 6.8 The UK Digital Strategy advocating for a nationwide rollout of full fibre broadband, with a specific focus on underserved areas. By ensuring that major developments in Newham contribute to this goal, the policy is directly supporting national priorities.
- 6.9 With full fibre coverage increasing from 34.52% in December 2021 to 76.12% in December 2024 (Ofcom Connected Nations, 2025), Newham is already exceeding the London average. This policy ensures that new developments contribute to this continued growth to facilitate modern and sustainable housing and economic development. The policy also responds to digital inclusivity. By addressing the gaps in affordability and accessibility, the benefits of digital connectivity improvement are widely distributed across the borough.
- 6.10 The policy is effective which seek to ensure developments are future proofed with necessary digital infrastructure to meet evolving demand by requiring sufficient ducting space for fibre connectivity. It supports the expansion of broadband access, which is crucial for both economic growth and digital inclusivity.
- 6.11 The effectiveness of this policy is also reinforced by the monitoring mechanism. The percentage of premises in the borough with full fibre coverage will be monitored annually through the Authority Monitoring Report, with a target to keep the percentage increasing over the plan period. This is set out in key performance indicator 60 in Table 16 of the Submission Local Plan (SD002b).
- 6.12 The policy is consistent with London Plan Policy SI6 and paragraph 10 of the NPPF which highlight the importance of high quality digital and communication infrastructure, require existing and new developments to support full-fibre connectivity and future proof ducting to enable upgrades with a focus on improving capability, affordability, security, resilience.

## Policy BFN4 Developer contributions and infrastructure delivery

Q14.6 Is policy BFN4 justified, consistent with national policy and the London Plan, and will it be effective in helping to coordinate the provision of essential new and improved infrastructure with development? In particular: a) The prioritisation in part 3 of affordable and family housing; local access to employment and training; and then delivery of required infrastructure? b) The approach in part 5 to Vacant Building Credit.

### Council Response:

- 6.13 The Council considers Policy BFN4 to be sound, being justified, effective, and consistent with both the National Planning Policy Framework (NPPF) and the London Plan Policy. BFN4 establishes a clear framework for securing developer contributions, prioritising affordable and family housing, employment/training, and infrastructure delivery, while retaining flexibility to ensure critical infrastructure is delivered where necessary.
- 6.14 Policy BFN4 is necessary to manage the significant growth planned for Newham (over 47,000 new homes). It is underpinned by the Infrastructure Delivery Plan (IDP) (EB004) and London Borough of Newham Local Plan Viability Assessment (LPVA) (EB099), which in some cases demonstrate viability and deliverability in line with NPPF paragraph 34.
- 6.15 The policy aligns with NPPF 2023, paragraphs 62–64, which emphasise the need to secure affordable housing through plan-making and viability testing, ensuring that contributions are realistic and deliverable. NPPF paragraph 61 (development supported by necessary infrastructure) and London Plan Policy DF1 (Delivery of the Plan and Planning Obligations), which set out how boroughs should secure contributions to infrastructure and manage cumulative costs. London Plan Policy D2, which requires development proposals to demonstrate that necessary infrastructure is provided to support growth.
- 6.16 By setting a clear prioritisation hierarchy (Part 3) and a locally tailored approach to Vacant Building Credit (Part 5), BFN4 provides certainty for developers and infrastructure providers, ensuring coordinated delivery.
- 6.17 In conclusion, Policy BFN4 is justified, consistent with national and London policy, and effective. It safeguards affordable and family housing delivery, ensures infrastructure sufficiency, and provides a robust framework for sustainable growth in Newham.
- 6.18 **a) The Council justifies the specific prioritisation outlined in Policy BFN4 Part 3**, which places affordable and family housing first, followed by local access to employment and training, and then delivery of required infrastructure.
- 6.19 National policy requires that plans are deliverable in practice and that obligations do not undermine viability. The NPPF does not prescribe a hierarchy of priorities within viability testing; rather, it requires that the cumulative impact of all policies is tested at plan-making stage. In line with NPPF paragraph 34 and the Planning Practice Guidance (PPG) on viability, the LPVA (EB099) has assessed the cumulative impact of policy requirements — including affordable housing, infrastructure, and design standards — to ensure that the Local Plan remains deliverable.

- 6.20 Policy BFN4 introduces a locally justified prioritisation. It places affordable and family housing first in the viability cascade, reflecting Newham's acute housing need and the Council's fundamental objective of Building a Fairer Newham. This approach is consistent with London Plan Policy H5 (maximising affordable housing delivery) and Policy H10 (ensuring an appropriate housing size mix, including family homes).
- 6.21 By explicitly placing affordable and family housing first, Policy BFN4 ensures that the delivery of homes meeting critical local needs is maximised even where site-specific viability challenges arise. Infrastructure and employment/training contributions remain essential, but the cascade provides a transparent mechanism to balance priorities at development management stage, in line with viability evidence and the specific context of each site.
- 6.22 This approach aligns with the NPPF 2023 (Paragraphs 58–64), which establish the national framework for viability testing and the prioritisation of affordable housing. It reflects a local policy choice that is firmly justified by evidence of both housing need and viability capacity in Newham.
- 6.23 The second priority—ensuring local access to employment and training—reinforces the objective of inclusive growth by connecting new residents to nearby opportunities, easing commuting pressures, and maximising the social value generated from development, in line with Policy BFN3.
- 6.24 While general infrastructure is listed third, policy BFN4 provides the general approach to ensure site-specific mitigation and necessary strategic infrastructure (delivered via CIL and S106) is planned and funded from the remaining capacity, coordinated through the IDP. Where specific infrastructure has been identified in the evidence base to be essential to make a development acceptable, these requirements are set out in the specific site allocation in the Neighbourhoods policies.
- 6.25 This measured, hierarchical approach guarantees that the core statutory requirements and strategic priorities of the Plan are met first, thereby making the Plan as a whole more effective and deliverable. The implementation text of BFN4:3 provides explicit flexibility:
- “Where necessary to deliver the provision of infrastructure required as part of a site allocation, or where its provision is considered necessary by internal, regional or national consultees or partner bodies, an alternative prioritisation may be considered more appropriate...”*
- 6.26 This clause confirms that the Council desires to remain flexible to the general prioritisation to ensure fundamental infrastructure is delivered first, where required to:
- Unlock a Site Allocation: e.g., a major road upgrade, utility reinforcement, or new school needed before development can proceed.
  - Meet External Statutory Requirements: e.g., Transport for London, NHS, or national utility providers requiring infrastructure as non-negotiable.
- 6.27 BFN4:3 further states that additional funding sources may be identified or explored to secure infrastructure delivery. This demonstrates proactive intent, ensuring infrastructure is not solely dependent on the viability cascade but supported through wider funding partnerships.

6.28 Policy BFN4 Part 4 requires large and high-density developments to demonstrate infrastructure sufficiency before approval. This is essential in Newham, where growth pressures are acute. By requiring Infrastructure Sufficiency Statements, the policy ensures that transport, utilities, schools, and healthcare capacity are properly assessed and that development is coordinated with infrastructure delivery. This aligns directly with the National Planning Policy Framework and the London Plan Policy D2, both of which emphasise that growth must be supported by adequate infrastructure.

6.29 The supporting implementation text BFN4:4 concludes:

*“Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.”*

6.30 This requirement elevates infrastructure sufficiency to a prerequisite for justifying the development scale and provides the mechanism through which the hierarchy set out in policy BFN4 can be considered flexibly on a site-by-site basis in order to effectively make infrastructure delivery an “unlocking” function where necessary, ensuring growth is sustainable and coordinated.

6.31 **b) Policy BFN4:5 states that Vacant Building Credit (VBC)** is not expected to apply in Newham due to its potential to undermine affordable housing delivery. In the exceptional circumstances where VBC is considered, schemes must demonstrate:

Policy Criterion	Purpose
a. The site would not otherwise come forward for redevelopment.	Ensures VBC is only used to unlock genuinely stalled sites.
b. No extant or recently expired permissions exist.	Prevents developers from reviving permissions to exploit VBC.
c. No building has been in continuous use for six months in the last five years.	Confirms genuine vacancy, not temporary disuse.
d. The building was not vacated solely for redevelopment.	Stops deliberate vacancy to qualify for VBC.
e. The building has been marketed for at least 24 months.	Demonstrates genuine attempts to reuse the building before redevelopment or demonstrates the lack of market interest in the existing format.

6.32 This approach is consistent with national policy, which allows discretion in applying VBC, and with the London Plan’s emphasis on maximising affordable housing. It ensures VBC is only applied in genuinely exceptional cases, preventing misuse and safeguarding affordable housing delivery.

6.33 The purpose of VBC nationally is to incentivise redevelopment of brownfield land. However, in Newham, the nature of available land and the strength of the housing market mean such an incentive is not required. More importantly, Newham has a local housing need of over 60 per cent genuinely affordable housing. For this reason, the borough must optimise every opportunity to deliver affordable homes. The Greater London Authority’s Affordable Housing and Viability Supplementary Planning Guidance, published in 2017, concludes that VBC is



unlikely to be suitable in London. Newham's restrictive stance is therefore consistent with both London-wide guidance and national policy, which allows discretion in its application.

- 6.34 The exceptional circumstances criteria set out in Policy BFN4:5 — requiring evidence of genuine vacancy, no recent permissions, and marketing for at least 24 months — provide a narrow but clear pathway for VBC where redevelopment would otherwise not occur. This balances viability with the borough's pressing affordable housing need.