

Examination of Newham Local Plan

Inspector: William Fieldhouse BA (Hons) MA MRTPI

Programme Officer: Charlotte Glancy

Tel: 07519 628064

Email: bankssolutionsuk@gmail.com

Examination website: [Local Plan Examination Overview – Newham Local Plan Examination – Newham Council](#)

IN6: Action points from week 1 hearing sessions

Introduction

Further to the discussions at the week one hearing sessions, the following actions are required in order to inform my consideration of whether the Plan is sound and/or how it could be made sound by main modifications. I may decide in due course that other or different main modifications are required, including to the parts of the Plan that I refer to below.

Responses should be submitted to the Programme Officer by **midday on Thursday 18 December 2025** unless otherwise specified.

Unless otherwise specified, a response is requested from the Council and no other party. Where appropriate, the responses to these action points may be discussed at subsequent hearing sessions.

The Plan's policies

AP1. Council to draft a potential modification to paragraph i.29 to state which parts of the Plan are policies.

Viability

The viability evidence indicates that most types of development meeting all of the policy requirements in the Plan would not be viable. The developments proposed on most of the allocations are shown to have negative residual land values, with significant shortfalls against relevant benchmark land values. This is particularly the case with the requirement for 60% affordable housing, but most allocations are also shown to not be viable with 35% affordable housing¹.

I have not yet reached a conclusion on this issue; the Council is asked to respond to this hypothetical question so that it can be considered at subsequent hearing sessions.

¹¹ ED011a [28 November 2025].

AP2. Council to advise which policies it would suggest be modified, and how, if I concluded that the Plan is not sound because the viability evidence indicates that the total cumulative cost of all relevant policies will undermine deliverability.

Policy H1 Meeting housing needs

AP3. Council to amend the proposed modifications² to policy H1 part 1 and reasoned justification in paragraph 3.174 to:

- a) Refer to “minimum housing requirement” (in policy H1 part 1, as appropriate).
- b) Refer to “minimum annual target” (in the table setting out the targets for the 3 delivery periods).
- c) Clarify that the London Plan target applies in the period from the adoption of the Plan until 31 March 2029 (ie not only from 1 April 2027 onward).
- d) Refer to the number of completions in the period 2019 to 2025 and the total shortfall against the London Plan for that period (in paragraph 3.174).

Policy J1 Employment and growth

AP4. Council to amend the proposed modification to policy J1 part 1 [FM08] to delete “over the plan period to” and insert the year from which the requirement relates (ie “... floorspace between 202X and 2042”).

Policy D4 Tall buildings

I have not yet reached a conclusion on this issue; the Council is asked to respond to the following hypothetical question so that it can be considered at subsequent hearing sessions.

AP5. Council to draft a potential modification to policy D4 to:

- a) Delete references to “limits” and “maximum” height ranges and refer to “appropriate” building heights.
- b) Refer to tall buildings being permitted in the tall building zones defined on the policies map having regard to the appropriate building heights set out in Table 1 subject to meeting other relevant policy requirements.
- c) Refer to tall buildings outside the tall building zones defined on the policies map only being permitted if all of the following criteria are met [set relevant locational and other criteria].
- d) Include reference to London Plan policy D3 optimising site capacity through a design-led approach in the list of Policy Links.

AP6. Council to prepare a potential modification to policy D4 Table 1 to:

- a) Amend the references to “conserve and enhance” to “conserve or enhance”.
- b) Amend the references to “avoid overshadowing impacts ...” to “preventing harmful impacts on biodiversity or water quality by avoiding or minimising overshadowing ...” (or similar).

² Council proposed modifications in ED006 schedule [FM04 and FM05] and ED007 SOCG with GLA.

c) Refer to “having regard to landmarks and key views identified in the relevant conservation area appraisal” (or similar).

Neighbourhoods diagram

AP7. Council to prepare a modified version of the Neighbourhoods diagram to indicate the conserve, enhance and transform areas [as proposed in FM010].

Part 1 policies and part 2 site allocation policies

The site allocation policies in part 2 of the Plan contain detailed, seemingly prescriptive requirements. Paragraph i.29 states that the Plan must be read as a whole and all policies relevant to the proposal will be used to assess its compliance and acceptability. Paragraph 4.3 states that site allocation policies will inform and guide development on specific sites and are to be read alongside the other policies in the Plan which set out the standards and requirements for different uses and factors such as design and transport.

The Council advised at the week one hearing sessions that the policies in part 1 could mean a specific requirement in a site allocation policy may not need to be met or could be met in a different way at the time of a planning application. For example, the application of policy SI4 could demonstrate that a primary school stated to be required on an allocation is no longer needed. Or the application of GWS1 and GWS3 could result in green space being provided in a different way to that stated in an allocation policy and / or indicated on the allocation map (“indicative diagram”).

AP8 Council to prepare a potential modification to paragraph 4.3 (and / or other relevant parts of the Plan) to clarify the relationship between the part 1 policies and site allocation policies, and in particular the flexibility there may be in achieving the development and design principles.

Allocation maps / indicative diagrams

AP9. Council to prepare a potential modification to paragraph 4.3 (and / or other relevant part of the Plan) to explain the purpose and status of the allocation maps (“indicative diagrams” [FM01]).

N17 Gallions Reach and N17.SA1 Beckton Riverside

AP10. Council to prepare a statement of common ground with St William Homes, Aberdeen Investments and TfL to address Q4.2 parts (a), (b) and (c) relating to the DLR extension and the nature and timing of development on the allocation. The SOCG should include potential modifications (and consider whether the deletion of “or similarly transformative public transport intervention such as a new river crossing” is necessary³), and identify areas of agreement and, if applicable, any outstanding areas of disagreement.

³ Proposed in the Council's M4 statement in response to Q4.2, but omitted from ED6.

N2.SA4 Excel Western Entrance

AP11. Council to prepare a potential modification to policy N2.SA4 and the allocation map (“indicative diagram”) to ensure that the requirement relating to open space / green space is justified and effective.

Queen’s Market

AP12. The justification for the inclusion of Queen’s Market as TBZ2 in policy D4 Table 1 (and its identification as a transform area in the Characterisation Study) will be considered further under Q4.16 on Thursday 11 December 2025 in the context of policy N14 Green Street.

William Fieldhouse

5 December 2025
