

Examination of Newham Local Plan

Inspector: William Fieldhouse BA (Hons) MA MRTPI

Programme Officer: Charlotte Glancy

Tel: 01903 776601

Email: bankssolutionsuk@gmail.com

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

IN7: Action points from week 2 hearing sessions

Introduction

Further to the discussions at the week two 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 8 January 2026**.

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. I will determine that after I have considered the Council's responses, and will refer to the relevant action points on the agendas for the week 3 and 4 hearing sessions.

Tall building spatial strategy and hierarchy

Sections 4.1 and 4.2 of the Characterisation Study Tall Buildings Annex¹ describe a tall building strategy and spatial hierarchy for the Borough. This seems to form a significant part of the Plan's "three dimensional" spatial strategy and justification for policy D4. However, it is not explicitly referred to in policy BFN1, policy D4 or the reasoned justification.

AP13. Council to prepare potential modification(s) to the Plan to set out the tall building strategy and spatial hierarchy, based on the existing evidence and analysis in the Tall Buildings Annex.

¹ EB23.

Tall building zone boundaries and heights

Week one action point AP5 asked the Council to draft a potential modification to policy D4 which is intended to provide greater flexibility for a design-led approach in the preparation of masterplans and planning applications, whilst maintaining a clear strategic approach to the location and height of tall buildings in different parts of the Borough. Specifically, the tall building heights would not be expressed as maximums or limits, and tall buildings may be allowed outside the zones in certain defined circumstances.

There are some tall building zones where the heights and boundaries differ significantly from developments with planning permission or from those proposed by site promoters. Notwithstanding that, the analysis, tall building strategy and tall building hierarchy set out in the Characterisation Study and Tall Buildings Annex, along with other relevant evidence in the examination library, may provide up-to-date and proportionate evidence to justify the zones and heights in the Plan (in the context of AP5).

However, there may be evidence that has become available since the Study, including in relation to emerging character / evolving context², that indicates in some cases that the zone boundary and/or heights set out in policy D4 Table 1 need to be modified.

AP14. Council to consider whether there is evidence in the examination library, including that relating to emerging character / evolving context, that indicates that the tall building zone boundaries defined on the policies map or the heights referred to in policy D4 Table 1 need to be modified in order to be justified and effective³.

N7.SA1 Abbey Mills

AP15. Council to prepare a potential modification to policy N7.SA1 (and site map / indicative diagram) to:

- a) Delete the reference to “equivalent amount of community floorspace” and ensure the policy is effective in allowing sufficient floorspace to meet future needs, including for a place of worship.
- b) Consider whether the shape of the “opportunity for local centre” on the site map / indicative diagram would be effective in allowing an appropriate form of development including a place of worship and other community facilities.
- c) Clarify how routes to and from the site could improve access and connectivity to West Ham Station and allocation N7.SA2 including the proposed Twelvetreets local centre.
- d) Consider whether the shapes / locations of the “opportunity for green space” shown on the site map / indicative diagram are justified and effective.
- e) Ensure that the building heights referred to in policy N7.SA1 are consistent with those referred to in TBZ16 (subject, if relevant, to AP14).

² London Plan paragraphs 3.9.2 and 3.9.3.

³ The Council should consider all TBZs in the context of this action point, not only those referred to in subsequent action points below.

N8.SA7 Rick Roberts Way

Policy N8.SA7 development principles refer to development protecting and enhancing “existing sports and recreation uses”. The infrastructure requirements for the site include 1.2 hectares of open space, play areas, a games area and a sports hall. It is not clear how those proposed facilities relate to the “existing sports and recreation uses”, or indeed what the existing uses to be “protected and enhanced” are.

AP16. Council to prepare a potential modification to policy N8.SA7 to clarify the requirements relating to open space, sport and recreation.

N8.SA9 Pudding Mill

AP17. Council to consider whether the requirement in policy N8.SA9 for development to “provide the same quantity of business and industrial floorspace as the permitted schemes” is justified, particularly bearing in mind the preceding requirements relating to the provision of industrial floorspace⁴.

N13.SA3 Former East Ham Gasworks

Policy N13.SA3 proposes residential, open space and community facility uses, and states that development should take place on the part of the site outside the Metropolitan Open Land (which is defined on the policies map and indicated on the site map / indicative diagram).

The Council’s capacity study indicates that the allocation could accommodate around 250 homes. Based on that, the Council’s evidence indicates that the development meeting all policy requirements would generate a negative residual land value of around minus £14 million, and would only become viable with the provision of 15% affordable housing (rather than the 60% required by policy H3). The viability assessment assumes a benchmark land value of £0.8m for the site (BLV3) and makes no allowance for abnormal costs⁵.

St William Homes’ evidence identifies significant site constraints that suggest that development consistent with policy N13.SA3 and other relevant policies would deliver fewer than 200 homes. Furthermore, that evidence indicates there would be significant abnormal costs meaning that such development would not be viable.

The allocation is not within an area identified in the Plan as being suitable for tall buildings, and the MOL boundary as proposed in the Plan limits the developable area. Policy N13.SA3 does not, therefore, seem to be justified or effective as it is unlikely to allow a form of development which has a reasonable prospect of being viable during the plan period.

⁴ The Council should also consider whether any similar requirements in other allocation policies (for example, N7.SA2) are also justified.

⁵ ED12 row 44 and oral evidence at hearing session on 11 December 2025.

AP18. Council to prepare a statement of common ground with St William Homes and the GLA⁶ that includes a potential modification to policy N13.SA3, and if necessary changes to the MOL boundary on the submitted policies map, that would allow a form of development which has a reasonable prospect of being viable during the plan period.

Policy N14 Green Street part 4 Queen's Market

Queen's Market is designated as a "transform area" on the Plan's Key Diagram, and within Tall Building Zone 2 in policy D4.

Policy HS4 states that development impacting on an existing market site will only be supported where:

- a. The number of pitches is maintained or enhanced, alongside provision of appropriate storage and servicing facilities, both during development (including temporary arrangements) and upon completion. And
- b. The overall visibility, quality and management of the market and its public realm will be improved.

Policy HS2 part 5 supports the redevelopment or refurbishment of sites in town centres, including with residential as part of a mixed use, where it contributes to the vitality and viability of the centre and optimises the use of the site provided that certain criteria are met, including relating to the re-provision of retail uses. Part 6 requires certain developments in town centres to deliver at least 10% of floorspace that will be "marketed and maintained at discounted rent".

Policy N14 part 4 aims to protect and enhance the role of Queen's Market.

The Council advised at the hearing session on 11 December 2025 that the characteristics of Queen's Market that the policy seeks to protect and enhance include its built form, visual character, and role.

Friends of Queen's Market have suggested modifications to the Green Street Neighbourhood Profile and Vision and to policy N14 intended to define the market's role / characteristics that they consider need to be protected⁷.

Policies HS2 and HS4 will be considered as part of matter 9 at the hearing session on Thursday 22 January 2026. The Council's response to the following action point relating to policy N14 will be considered at that hearing session in the context of those part 1 policies and London Plan policy E9 (and any other relevant Plan and London Plan policies).

⁶ London Plan policy G3 part C "any alterations to the boundary of MOL should be undertaken through the Local Plan process in consultation with the Mayor".

⁷ EOD6 published 11 December 2025.

AP19. Council to draft a potential modification to policy N14 to ensure that it is clear and therefore effective with regard to the role / characteristics of Queen’s Market that it is aiming to protect and enhance⁸.

Overshadowing impacts

Week one action point AP6 asks the Council to prepare a potential modification to the requirements in policy D4 Table 1 relating to “overshadowing impacts on watercourses”.

AP20. Council to consider whether other policy requirements in the Plan relating to “overshadowing” (eg policy N8.SA8 relating to overshadowing allotments⁹) also need to be modified to be justified and effective.

Automated vacuum waste collection system

AP21. Council to consider whether the requirements in relevant site allocation policies relating to the delivery of an automated vacuum waste collection system need to be qualified (for example, with reference to “where practicable and viable”).

Allocation maps / indicative diagrams

AP22. In addition to week one action point AP9, Council to consider whether the keys to the site maps / indicative diagrams need to be modified so that they are relevant to the specific site and surroundings. For example, “sensitive edge” – to clarify whether it is due to “heritage assets” and / or “low rise context”.

Metropolitan Open Land

London Plan policy G3 states that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B.

AP23. Council to provide a list and map of all alterations to MOL boundaries that are made in the Plan and provide a brief summary of the exceptional circumstances for each.

William Fieldhouse

12 December 2025

⁸ As part of this, the Council is requested to identify if there are any policies in the London Plan that are relevant to “affordable” retail / market uses.

⁹ And proposed modification MO105 [ED15 page 23].