

Examination of Newham Local Plan

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IN3.3: Inspector's Further Questions: M5 Housing Land Supply

Introduction

My issues and questions relating to matter 5 housing land supply were published along with those relating to all other matters on 9 October 2025¹ with a deadline of 27 November 2025 for written statements.

However, I stated at that time that I would publish further questions when I had considered further, updated information relating to housing land supply that I had agreed the Council could submit by 21 November 2025. That further information from the Council was published on 24 and 26 November 2025 (see below)

The following questions, about that further information, will be considered as part of matter 5 at the hearing session on Tuesday 20 January 2026.

If any representor wishes to submit a written statement in response to the following questions it should contain no more than 2,000 words and be received by the Programme Officer by **midday on Friday 9 January 2026**. There is no need to repeat anything that is contained in the written statements for matter 5 published on the examination website on 4 December 2025².

The Council does not need to submit a written statement in response to the following questions, but may do so if it has some additional comments to make.

Council's updated housing land supply evidence

Further information from the Council about housing land supply was published on 24 and 26 November 2025:

- ED7 Statement of Common Ground with the GLA
- ED8 Housing land supply proformas
- ED9 Five year housing land supply from 1 April 2027

¹ IN3

² EWS26 to EWS29.

I subsequently asked the Council to summarise the latest overall housing land supply evidence based in the above three documents³. The Council's response to that was published on 20 December 2025 and includes the following:

	2025-27	2027-29	2029-32	2032-37	2037-42	Total
Allocations	2,563	7,986	9,437	13,032	11,681	44,699
Small sites	760	760	1,140	1,900	1,900	6,460
Windfalls	0	0	0	0	3,328	3,328
Permissions*	593	1,932	858	0	0	3,383
Total	3,916	10,678	11,435	14,932	16,909	57,870

* On sites not allocated in the Plan, including resolutions to grant planning permission

Council proposed modifications to policy H1

In response to week one action point AP3, the Council has published a proposed modification to policy H1 to refer to a net increase of between 45,611 and 53,954 residential units between 2027 and 2042⁴. The top of that range (53,954) seems to be the sum total of the above figures for the period 2027 to 2042 (ie excluding 3,916 expected to be completed between 2025 and 2027).

The Council's proposed modification to policy H1 (in response to AP3) also sets out a stepped trajectory to deliver the minimum housing requirement (45,611 ie bottom of the range) in the four periods between 2027 and 2042 included in the table of figures above.

The Council's response to AP3 also proposes a modification to paragraph 3.174 to clarify that the London Plan (2021) target to deliver 47,600 homes between 2019 and 2029 will continue to apply when the Plan is adopted, and that there was a shortfall against that target of 10,966 homes between 2019 and 2025.

The Council's latest projected completion figures for 2025 to 2027 (3,916) indicate that the shortfall against the London Plan target will have increased by 5,604 to a total of 16,570 by 31 March 2027⁵.

Policy H1, and how the Plan's housing targets are expressed, were considered under matter 2 at the hearing session on Tuesday 2 December 2025.

FQ5.1 Does the Council's proposed modification to paragraph 3.174 need to be amended to refer to the trajectory for the period 2025 to 2027 and what that indicates the total shortfall against the London Plan target is expected to be by 31 March 2027?

³ IN3.2 published 17 December 2025.

⁴ ED18.

⁵ $4,760 \times 2 = 9,520$. $9,520 - 3,916 = 5,604$. $5,604 + 10,966 = 16,570$.

Site allocations

All of the site allocations, including the latest evidence about deliverability and developability and trajectories set out in the Council's completed proformas⁶, were considered under matter 4 in the week 1 and 2 hearing sessions.

At those sessions, the site promoters indicated the following:

- 1,200 homes are likely to be completed on N2.SA4 Thameside West by 31 March 2032 rather than 2,500 assumed by the Council (Silvertown Homes)
- 600 homes are unlikely to be completed on N17.SA1 Beckton Riverside by 31 March 2032 (St William Homes)

FAQ5.2A Is there a reasonable prospect that a total of 44,699 homes will be built on site allocations between 1 April 2025 and 31 March 2042?

FAQ5.2B Is there a realistic prospect that a total of 17,423⁷ homes will be completed on site allocations between 1 April 2027 and 31 March 2032?

Small sites and windfalls

The Council's responses to SPQ23.1(b) and (c) provide the following figures for completions on small sites and other windfalls between 2014 and 2024:

	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	23/24	24/25
Small	146	527	566	314	335	213	156	297	158	474
Other	350	1062	30	22	125	192	481	194	9	155

Those figures indicate that the average completion rate on small sites was 319 homes per year and on other windfalls 262 homes per year. In other words, total windfalls averaged 581 homes per year between 2014 and 2024.

The Council's latest trajectory indicates that a total of 9,788 homes will be built on small sites and windfalls in the modified plan period 2027 to 2042⁸. Whilst the trajectory indicates different completion rates at different times, that represents an overall average of 575 per year over the 17 year period.

FAQ5.4A Is the assumption that a total of 9,788 homes will be built on small sites and windfalls between 1 April 2025 and 31 March 2042 justified?

The latest trajectory indicates that a total of 1,900 homes will be completed on small sites in the five year period between 2027 and 2032⁹. No other windfall allowance is made for that period.

⁶ ED8.

⁷ 7,986 + 9,437 = 17,423.

⁸ 6,460 + 3,328 = 9,788.

⁹ 760 + 1,140 = 1,900.

FQ5.4B Is the assumption that a total of 1,900 homes will be completed on small sites between 1 April 2027 and 31 March 2032 (380 per year) justified?

Sites with planning permission or a resolution to grant planning permission

FQ5.6A Is there a reasonable prospect that a total of 3,328 homes will be built on sites with planning permission or a resolution to grant planning permission between 1 April 2025 and 31 March 2042?

FQ5.6B Is there a realistic prospect that a total of 2,790¹⁰ homes will be completed on sites with planning permission or a resolution to grant planning permission between 1 April 2027 and 31 March 2032?

Five year supply following adoption

The Council's response to Q5.8 advises that, based on the minimum housing requirement and stepped trajectory set out in the proposed modification to policy H1 referred to above, the five year requirement for the period 1 April 2027 to 31 March 2032 (including a 20% buffer) would be 20,575¹¹.

FQ5.8A Based on the Council's proposed modification to policy H1, is the five year requirement for the period 1 April 2027 to 31 March 2032 20,575 (including a 20% buffer)?

The Council's latest trajectory referred to above, indicates a total of 22,113¹² homes being completed between 1 April 2027 to 31 March 2032. That figure is referred to in the Council's response to Q5.8 which advises that this represents 5.37 years' supply.

The sites contributing to the five year supply from 1 April 2027 are set out in ED9 Five year housing land supply from 1 April 2027. This indicates that the five year supply comprises:

• Sites with detailed planning permission	4,255
• Sites with outline planning permission <10 homes	0
• Sites with outline planning permission 10 or more homes	7,794*
• Sites with resolution to grant planning permission	4,062
• Site allocations and small sites without permission	6,002
• Total	22,113

* Of the 7,794 with outline planning permission, 4,370 homes have detailed planning permission under hybrid permission or reserved matters.

¹⁰ 1,932+ 858 = 2,790.

¹¹ EWS026 written statement for matter 5.

¹² 10,678 + 11,435 = 22,113.

FQ5.8B Is there a realistic prospect that a total of 22,113 homes will be completed between 1 April 2027 and 31 March 2032? In particular, is there clear evidence to demonstrate the following:

- a) 3,424 homes will be completed on sites with outline planning permission¹³
- b) 4,062 homes will be completed on sites with a resolution to grant planning permission
- c) 6,002 homes will be completed on site allocations and small sites without planning permission.

William Fieldhouse

22 December 2025

¹³ 7,794 – 4,370 = 3,424.