

London Borough of Newham

Housing Delivery Test Action Plan

June 2025

WE ARE NEWHAM.

1. Introduction

- 1.1 The Housing Delivery Test Action Plan sets out the measures the Council is taking to help facilitate delivery of quality homes in the Borough. It has been prepared in response to Newham's 2023 Housing Delivery Test result.

What is the Housing Delivery Test?

- 1.2 The Housing Delivery Test (HDT) was launched by the Ministry of Housing, Communities & Local Government (MHCLG) in July 2018 as part of published revisions to the National Planning Policy Framework (NPPF). It is an annual measure of housing delivery for Local Planning Authorities (LPAs), being one of a number of reforms introduced by the Government designed to boost house building across the country.
- 1.3 The HDT measurement is a percentage calculated from the net homes delivered against the number of homes required for a plan-making authority over a rolling three year period.
- 1.4 Results of the Housing Delivery Test are published annually by the MHCLG, with the results of the 2023 measurement published in December 2024. The detailed results of the 2023 measurement for Newham is provided below.

London Borough of Newham 2023 HDT Measurement¹

Number of homes required			Total	Number of homes delivered			Total	Measurement	Consequence
2020-21	2021-22	2022-23		2020-21	2021-22	2022-23			
1832	2752	2752	7336	1577	2360	526	4463	61%	Presumption

- 1.5 During this monitoring period the London Legacy Development Corporation (LLDC) was a separate plan-making authority. However, the majority of the area within the LLDC boundary comprises LBN land. As such, the HDT result for the LLDC is also provided below. It should be noted that the LLDC's planning powers were transferred back to Newham on 1st December 2024.²

London Legacy Development Corporation 2024 HDT Measurement

Number of homes required			Total	Number of homes delivered			Total	Measurement	Consequence
2020-21	2021-22	2022-23		2020-21	2021-22	2022-23			
1,434	2,155	2,155	5,744	1,408	1,570	2,018	4,996	87%	Action plan

- 1.6 MHCLG have disaggregated the LLDC area from LBN in its published HDT measurements, with each planning authority individually assessed for the purposes of measurement.

¹ MHCLG: [Housing Delivery Test: 2023 measurement - GOV.UK](#)

² LLDC: [Transfer of Planning Powers | Queen Elizabeth Olympic Park](#)

Consequences of failing the Housing Delivery Test

- 1.7 In introducing the HDT measurement, the NPPF outlines associated required 'actions' that Local Authorities must take if housing numbers are not delivered in accordance with the identified housing requirement for their area. These measures are intended to boost provision in future years, and are of varying consequence dependent on the scale of under-delivery. The consequences of HDT results apply until the publication of any subsequent result. For clarity, a summary of the HDT consequences is outlined below.

If housing delivery falls below 95%		If housing delivery falls below 85%		If housing delivery falls below 75%
<ul style="list-style-type: none"> The publication of an action plan 	+	<ul style="list-style-type: none"> a 20% buffer on an LPA's 5-year land supply 	+	<ul style="list-style-type: none"> the NPPF's presumption in favour of sustainable development applies

- 1.8 Following the publication of the HDT results for 2023, LBN received a result of 61%. This means the NPPF's presumption in favour of sustainable development applies, the Borough is also required to apply a 20% buffer on its future Five Year Land Supply, and produce an action plan to demonstrate how the Borough plans to incentivise increased housing delivery across future years.

Causes of Under-delivery

- 1.9 In July 2024, Newham published a Site Allocation and Housing Trajectory Methodology note, which provides an analysis of why Newham has been unable to achieve its housing target.
- 1.10 An update to this note will be published with the Submission Local Plan when it is submitted to the Secretary of State for examination later this year.
- 1.11 The latest version of this note can be found on the following webpage: [Evidence Base Documents – Newham Local Plan Review – Newham Council](#).

2. Action Plan

Action Point 1: Reviewing Newham's Local Plan

- Continue work on the refresh of the Newham Local Plan, submitting the plan to the Secretary of State for examination in 2025. The plan includes 45 site allocations and a new housing target that seeks to deliver over 50,000 homes across the new plan period. It also plans for a wide range of infrastructure to support new housing growth, which will be monitored through updates to Newham's Infrastructure Delivery Plan (IDP).

- 2.1 Newham adopted its current Local Plan in December 2018. The 2018 Local Plan housing target seeks the delivery of 43,000 homes between 2018 and 2033, and contains 31 strategic site allocations.
- 2.2 LBN as a pro-development authority is committed to boosting housing supply to address local needs. This means not only delivering more homes, but ensuring new housing is well-designed, resilient to climate change, improves air quality and creates healthy environments. Since 2021 we have consulted on an Issues and Options document, a draft Regulation 18 Local Plan and a Draft Submission Regulation 19 version of the Local Plan. Our new housing target has been shaped through design-led capacity testing of site allocations, and provides a more realistic stepped trajectory against which to monitor housing delivery. The Infrastructure Delivery Plan will continue to work in tandem with the Local Plan, identifying and monitoring infrastructure needs and the delivery of key pieces of infrastructure to support housing growth.

Action Point 2: Continuing to implement the proactive steps taken at administration level to boost housing delivery

- Utilise secured grant funding to continue delivery of the Affordable Homes for Newham programme, in accordance with Mayoral pledges.
- Continue to support the authority's wider estate regeneration programme at Canning Town, Custom House and Carpenters to deliver co-produced, mixed tenure projects. These are now all being delivered by the Council's dedicated housing company, Populo Living.
- Working with the GLA to help address the delivery constraints facing the Capital, namely the delivery of genuinely affordable homes.

- 2.3 Newham's Housing Delivery Strategy (2021) sets out the borough's approach to meeting our residents' housing needs, including for genuinely affordable homes. In recent years Newham has secured grant funding through the Mayor of London's Building Council Homes for Londoners programme. The grant is being used through the Affordable Homes for Newham Programme, which prioritises the delivery of genuinely affordable homes by Newham's Regeneration team and Populo Living (the Council's wholly owned housing company).
- 2.4 An internal Housing Delivery Board, which planning attend, allows for early discussions to overcome challenges and ensures the timely delivery of the projects.
- 2.5 In 2023, Newham also endorsed the Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF). The Royal Docks and Beckton OAPF provides planning, regeneration and design guidance for the Royal Docks area, Beckton Riverside and much of Canning Town and Custom House, guiding and facilitating development in the area up to 2041. The OAPF will also be a mechanism to help support the delivery of key infrastructure in the area, which in turn will facilitate the delivery of design-led site allocations within the OAPF area boundary.
- 2.6 Looking to the longer term, the Local Authority's Regeneration Programme is also set to deliver high numbers of new dwellings across the Authority's new plan period. To date, planning permission has already been granted for:
- the first phases of the Custom House regeneration, including outline permission for the wider Freemasons Road site allocation; and
 - the Vincent Street site, which forms part of the wider Canning Town East site allocation.
- 2.7 A resolution to grant has also been agreed for the Carpenters Estate outline planning permission.

Action Point 3: Maintain a constructive dialogue with relevant stakeholders to engender a co-ordinated approach to delivery

- Continuing the practice of listening to and engaging with developers, landowners, land promoters, residents and Duty to Co-operate partners through the wider plan-making and monitoring process.
- Working with Developers to inform the Five Year Land Supply, identifying where sites are stalled and understanding any barriers to delivery which can be addressed by the Local Planning Authority.

- Providing an efficient and high quality Development Management procedure that offers certainty to applicants at the earliest stage of the planning process, facilitated through comprehensive Pre-Application feedback and Project Planning Performance Agreements (PPPAs).
- Promoting the use of PPPAs for large-scale, complex schemes, helping to streamline decision making for strategically significant development proposals.
- Utilising the Development Members Control Forum and the independent Design Review Panel to identify any questions or concerns surrounding major development schemes, helping to smooth their transition through the decision making process.
- Ensuring all planning applications are determined in a timely and efficient manner, working with Applicants to resolve issues which arise through assessment and decision making where these can be overcome within the scope of the application submitted.
- Offering dedicated planning officers, as part of the Planning Performance Agreement offer, on strategic sites.
- Funding a dedicated transition project officer and two planning officers to support the transition of planning powers from the London Legacy Development Corporation (LLDC), ensuring timely support for the delivery of sites, through the discharge of conditions and delivery of obligations as well as sufficient resource to manage the large remaining workload of new sites and applications transferring from the LLDC.

- 2.8 As outlined in Action Point 1, Newham are in the process of reviewing our adopted Local Plan. As part of the plan-review process to date, we have undertaken extensive engagement with both residents and developers on the policies and site allocations contained within the draft plan. This has helped to ensure the deliverability and soundness of proposed policies, targets and site allocations within the draft Submission Local Plan.
- 2.9 Separate to plan-making, a responsive Development Management team will also help to ensure that we continue to deliver high quality customer service. Constructive dialogue with developers throughout the application cycle is critical to the timely processing of applications. This includes ensuring any issues arising from schemes are addressed at an early stage of the application process. Continued utilisation of pre-application discussions and planning project performance agreements (PPPAs) will provide applicants with increased certainty around whether proposals accord with the provisions of the development plan and help to guarantee the smooth transition of applications through the planning process. Similarly, the Council's Development Control Members Forum and Design Review Panel help to facilitate the determination of complex major scale development works through the application and development committee process.

Dedicated Site Allocation support to applicants

- 2.10 Newham has a large number of significantly sized site allocations, in particular around the Royal Docks, some of which are owned by the GLA Land and Property Ltd, which the Council's planning team is actively engaged in enabling the delivery of. This has included offering dedicated planning officers, as part of the Planning Performance Agreement offer, to provide a bespoke and responsive service to provide early advice and timely decision making. This has been taken up on four strategic sites.
- 2.11 In addition, for sites where the GLA has ownership, the Council shares the resourcing of the dedicated Royal Docks Team, who are tasked with enabling the wider regeneration of the Enterprise Zone, including the delivery of key sites. The planning service regularly engage with this team, including through the creation of site specific boards to provide project updates and coordinate decision making and delivery.

London Legacy Development Corporation transition project officer

- 2.12 On 1st December 2024, the Local Planning Authority function of the LLDC transferred back to the four host boroughs. Newham's portion of the LLDC is the largest of the four boroughs and the borough has the largest number of development sites in delivery, in planning and in the pipeline.
- 2.13 Newham consider it inevitable that such a transition will result in a period of slower delivery, especially as fewer schemes than anticipated were permitted before transition, a view shared with the LLDC. However, to reduce this as much as possible and to enable a smooth transition, the Council self-funded a dedicated transition project officer and two planning officers to ensure that there can be timely support for the delivery of sites, through the discharge of conditions and delivery of obligations as well as sufficient resource to manage the large remaining workload of new sites and applications transferring from the LLDC.

Action Point 4: Beckton Riverside Delivery

- Continue engagement with the GLA, TfL and Homes England to facilitate the delivery of Beckton Riverside, the borough's largest site allocation. This includes addressing the complex infrastructure requirements for the site, helping to ensure the coordination required to optimise and deliver the site as quickly as possible.

- 2.14 Beckton Riverside is the borough's largest site allocation and a key deliverable of the Royal Docks and Beckton Opportunity Area. The Council, the GLA, TfL and Homes England have been working collaboratively over a number of years with the landowners and other stakeholders to address the complex infrastructure requirements (DLR extension, interaction with Beckton Sewage Treatment Works, utilities infrastructure and safeguarding for a road bridge) and ensure the coordination required to optimise and deliver the site as quickly as possible.

- 2.15 In December 2019, a DLR extension to Thamesmead was formally proposed by Transport for London as part of the draft Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF). The Royal Docks and Beckton Riverside OAPF (2023) continued to highlight the important role of this DLR extension, with one of the key objectives of the OAPF to outline the opportunities associated with a future DLR extension to Beckton Riverside and how these could be supported.
- 2.16 In May 2023, Newham's Cabinet approved the submission of the Strategic Outline Case for the Thamesmead and Beckton Riverside Public Transport Programme to Government by Transport for London on behalf of the Programme partners and approved £500k contributions to the programme over the next 4 years, as part of an overall funding package of £10-12m by the Government and other stakeholders, in order to enable further feasibility work for public transport interventions and develop a comprehensive business case and consents programme.
- 2.17 In June 2023, the Strategic Outline Business Case for the extension was submitted to HM Government.
- 2.18 In 2024, TfL commenced a consultation on the transport options on proposals to extend the DLR to Beckton Riverside and Thamesmead. Following this, TfL have decided to progress with work to develop the DLR extension to Beckton Riverside and Thamesmead as their preferred option. As part of this work they also confirmed they would progress discussions with Government on the potential removal of safeguarding for the Thames Gateway Bridge.
- 2.19 During the Local Plan making process, Thames Water have raised new concerns with regards to proximity of residential development to the sewage works. Due to the timing of both the development of the Opportunity Area Planning Framework and planning application process, which ran alongside the development of the Local Plan, further discussions have taken place throughout 2022 and 2023 with Newham's planners, environmental health and regeneration colleagues, the GLA, Thames Water and the landowners regarding the potential odour impact and need for an odour impact assessment.
- 2.20 St William agreed to fund a further independent odour impact and mitigation study. Newham Council, Thames Water and St William agreed the brief, and WSP was appointed to undertake the work in 2022. Further information was shared by Thames Water to inform the study. A draft of the study was shared in January 2024 which indicated that the odour zone would have some impact at the northern portion of the site, but was not as extensive as had been suggested by Thames Water. A discussion on the interim Odour Report with landowners, the GLA, Transport for London and Homes England was held in May 2024. It was agreed that external verification of the two reports, and an additional report undertaken on behalf of ABRDN/Aberdeen, was required, which is currently taking place, funded by Homes England.
- 2.21 In February 2025, Homes England, at LB Newham's request appointed a consultant to develop a delivery programme to align the strands of work taking place to support the delivery of the site. They are also exploring the potential of funding a dedicated programme officer to support the delivery of the site in 2025/26.

Action Point 5: Stratford Station capacity enhancement

- Working with the London Legacy Development Corporation (LLDC), Network Rail and Transport for London (TfL) to develop the Strategic Outline Business Case (SOBC) for the long-term redevelopment of Stratford station and the surrounding area to address capacity and connectivity issues. Early agreement on funding improvements will help unlock and accelerate development in the wider area.

- 2.22 Stratford Station, along with Stratford's two bus stations, form a key strategic public transport interchange for London. It has become the fifth busiest station on the entire National Rail network, the sixth busiest station on TfL's network, and is also the busiest bus station in London. Since 2001, Stratford Station has seen the largest absolute amount of passenger growth of any station in the UK. The station was not designed to accommodate the volume of passengers now using it and this has resulted in unacceptable levels of overcrowding, regular station closures and poor passenger experience.
- 2.23 In 2019, the London Legacy Development Corporation (LLDC), Newham, Network Rail and Transport for London (TfL) started to prepare a Strategic Outline Business Case (SOBC) for the long-term redevelopment of the station and the surrounding area to address capacity and connectivity issues. The Strategic Outline Business Case was submitted to the Government in July 2023. This work is supported by a dedicated programme officer who sits between the LLDC and LB Newham.
- 2.24 Further work is being undertaken to develop this work and Newham will continue to work with the LLDC (in their remaining mayoral development corporation role), London Borough of Waltham Forest and other partners to support this work and to ensure the Local Plan can support the delivery of necessary station infrastructure. Newham is committed to ensure suitable alignment between the emerging Plan and the business case. The Submission Draft Local Plan includes a site allocation for the Stratford Station site, which set out infrastructure requirements and development and design principles for different plots.
- 2.25 Significant overcrowding is not expected to occur until after the Local Plan timeframe, but early agreement on funding improvements will help unlock and accelerate development, not only in the surrounding area (where the reconfiguration of the station and bus station would unlock some developable land) but more significantly in the wider area and growth corridors within London, which rely on Stratford station as a key interchange.

Monitoring Action Points

- 2.26 Monitoring of the measures employed by the Council to stimulate housing delivery will continue to be assessed through the Local Authority Monitoring Report Housing Bulletin. This document will look at the issue of delivery figures in the wider plan context, analysing reasons for delivery figures across the financial years that are monitored.