

Homes Comments

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.	The current R18 plan fails to provide for enough housing provision within the LBN, with the housing supply figure of between 46,633 and 52,133 homes equating to between 2,743 and 3,067 dwellings per annum and failing to correspond to the identified need set out within the SHMA 2022 or London Plan 2021.		1			H1 Meeting Housing Needs	Homes	Reg18-E-070/004	Aston Mansfield	Reg18-E-070

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	Comment noted.	Since LBN's Call for Sites exercise in December 2022, the Government has published the consultation document on the proposed approach to updating to the National Planning Policy Framework (NPPF). As set out in the NPPF consultation document, policy changes are anticipated to take effect from Spring 2023. Plan makers will have until June 2025, however, to submit local plans under the current planning system. It is important to note that within the proposed updated NPPF, a higher housing delivery is expected from the top 20 urban areas, of which the LBN forms part of one, and it remains incumbent on LBN to plan for their full housing need. According to the London Plan 2021, London should be treated as a single housing market and therefore it is necessary to consider the constraints on development more widely across London if the proposed housing targets are to be met. Therefore, any sites that are appropriate and available for development should be included within the site allocations, as it will boost the housing supply in the Capital.		1			H1 Meeting Housing Needs	Homes	Reg18-E-070/008	Aston Mansfield	Reg18-E-070

Reg18 -E-070	Aston Mansfield	Reg18- E- 070/009	Homes	H1 Meeting Housing Needs			1		Site Allocation and Housing Trajectory Methodol ogy 2022	Notwithstanding this, LBN acknowledge within the Site Allocation and Housing Trajectory Methodology Note (December 2022) that they are unable to demonstrate a 5-year housing land supply when measured against the adopted London Plan housing target. Indeed, LBN recognise that there is currently only five-year land supply of 2.69 years	Comment noted.
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	A change to this policy approach has not been made. We did not consider this change to be necessary as London Plan Policy G3 stipulates 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 of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach.	Alongside a potential uplift in expected housing delivery targets via the standard method, it is clearly inevitable that there will be a review of Metropolitan Open Land boundaries to provide the necessary housing growth, and it is essential that the local authority plans responsibly for this so enabling them to also harness the associated economic development which comes with it.		1			H1 Meeting Housing Needs	Homes	Reg18-E-070/010	Aston Mansfield	Reg18-E-070
	Comment noted.	Newham Strategic Housing Market Assessment (SHMA) (2022) 4.2 As explained in the SHMA, the London Plan sets a target of 3,280 dwellings per annum for the planning area outside of LLDC (this is the same as the adopted Local Plan), with a further capacity target of 14,800 or 1,480 per annum in the area covered by LLDC in Newham. This gives a total capacity-based target in LBN of 4,760 dwellings per annum.		1			H1 Meeting Housing Needs	Homes	Reg18-E-070/018	Aston Mansfield	Reg18-E-070

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Reg18-E-070	Aston Mansfield	Reg18-E-070/019	Homes	H1 Meeting Housing Needs			1			4.3 The SHMA identifies a total need for 55,872 dwellings over the 17-year plan period based upon a need for 28,161 dwellings to meet projected growth plus 27,711 dwellings to address pent-up demand. This equates to 3,286 dwellings per year and this figure is similar to the baseline figure of 3,280 dwellings identified within the London Plan.	Comment noted.
Reg18-E-070	Aston Mansfield	Reg18-E-070/020	Homes	H1 Meeting Housing Needs			1		Newham Strategic Housing Market Assessment, Opinion Research Services (2022)	4.4 The figure provided within the SMHA does not correspond with the expectation identified within Policy H1, which states that LBN will enable a net increase of between 46,633 and 52,133 quality homes between 2021 and 2038. This equates to between 2,743 and 3,067 dwellings per annum. Further clarification is therefore sought on this calculation.	A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.
Reg18-E-070	Aston Mansfield	Reg18-E-070/021	Homes	H1 Meeting Housing Needs			1	3.13 7	Site Allocation and Housing Trajectory Methodology 2022	4.5 According to the Justification of Policy H1, this range target is capacity-derived, based on approved planning permission figures, design-led capacity testing of site allocations, capacity assumptions from the 2017 Strategic Housing Land Availability Assessment and capacity assumptions from lapsed application sites. This document, however, has not been referenced in the Evidence Base documents, nor does it appear to be available online.	The 2017 Strategic Housing Land Availability Assessment is published on the Greater London Authority's website: https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

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	Comment noted.	Site Allocation and Housing Trajectory Methodology Note (December 2022) 4.6 Table 2 of the above Evidence Base document identified the criteria used in the considerations and assessment. This identifies that sites designated as Metropolitan Green Belt, Metropolitan Open Land or protected green space have not been taken forward.		1			H1 Meeting Housing Needs	Homes	Reg18-E-070/022	Aston Mansfield	Reg18-E-070

Reg18 -E-070	Aston Mansfield	Reg18- E- 070/023	Homes	H1 Meeting Housing Needs			1		Site Allocation and Housing Trajectory Methodol ogy 2022	<p>4.7 Table 10 shows that Newham is unable to demonstrate a 5-year housing land supply when measured against the adopted London Plan housing target. The document states; <i>“This position is worsened when a 5% buffer is applied to the borough’s capacity derived housing target. As per national guidance, shortfall against Newham’s previously adopted housing requirement figure has been added to the 5-year supply target (the Sedgefield approach). Taking the shortfall and buffer into consideration Newham only has a five-year land supply of 2.69 years. Table 8 demonstrates that Newham also does not have sufficient identified housing capacity to meet the Borough’s London Plan housing requirement over the course of the London Plan period, with a shortfall of 15,721 units” (Paragraph 4.6.2).</i></p> <p>4.8 Paragraph 4.6.3 provides justification for the “more realistic housing requirement figure, set out in draft policy H1, which is based on an up-to-date assessment of deliverable sites and their phasing”.</p> <p>4.9 Whilst noted as a “more realistic figure”, the figure identified within emerging Policy H1 figure does not fulfil required demand outlined within the SHMA or London Plan. Paragraph 2.6.6 expects Newham to see “an ambitious level of housing delivery over the course of the new Local Plan period”. This is not reflected within the figures set out in draft policy H1. As such, this needs to be justified and/or further sites need to be identified to meet the demand.</p>	<p>A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the ‘Site Allocation and Housing Trajectory Methodology’ Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.</p>
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Reg18 -E-070	Aston Mansfield	Reg18- E- 070/066	Homes	H1 Meeting Housing Needs			1		<p>0.6. HOMES</p> <p>a. H1. Meeting Housing Needs - Would you keep, change or add something to this policy?</p> <p><i>1. Newham will enable a net increase of between 46,633 and 52,133 quality homes between 2021 and 2038. This will be achieved through:</i></p> <p><i>a. the majority of new housing being brought forward on Site Allocations; and</i></p> <p><i>b. the optimisation of housing delivery on sites below 0.25 hectares in size; and</i></p> <p><i>c. supporting residential developments that come forward on windfall sites (land not allocated within the Local Plan for uses other than residential) unless other policies within the Local Plan direct otherwise</i></p> <p>Object: Figure does not correspond to SHMA 2022 or London Plan.</p> <p>A net increase of 46,633 – 52,133 homes over the plan period equates to between 2,743 and 3,066 homes per year, slightly above the levels expected within the HDT 2021 (2,367 homes per year), but even at the top end below the figure of 3,280 homes expected within the borough outside of the London Legacy Development Corporation Area, set out within the London Plan 2021 (Table 4.1 - 10-year targets for net housing). This is notwithstanding the requirement for an uplift on the standard method figure within the top 20 urban area set out within the draft NPPF.</p>	<p>A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.</p>
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				1			H1 Meeting Housing Needs	Homes	Reg18-E-070/067	Aston Mansfield	Reg18-E-070
	No detail is provided within the R18 plan as to the capacity of individual site allocations, or the total level of housing that would be expected to be delivered as a site allocation or on Windfall sites.										
	A change to this policy approach has not been made. We did not consider this change to be appropriate as this information should remain sensitive. However, in order for the underlying assumptions that have informed the housing trajectory to be interrogated we have published the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. We welcome the discussions held with the GLA to date, which have set out the challenges of delays to schemes phasing. These have had a significant impact on our ability to meet our London Plan housing target. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.										
		H1.1		1.b			H1 Meeting Housing Needs	Homes	Reg18-E-070/068	Aston Mansfield	Reg18-E-070
	The plan details that Newham will aim to deliver 3,800 homes on small sites below 0.25 hectares, however no detail is provided as to whether this figure could be realistically achieved within the Local Plan period.										
	This policy approach has now changed due to further work being undertaken on the draft Local Plan's small sites methodology. Please see the new wording in Policy H1. Further information on our approach to small sites it set out in the 'Site Allocation and Housing Trajectory Methodology' published as part of the draft Local Plan evidence base.										

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	A change to this policy approach has not been made. We did not consider this change to be necessary as London Plan Policy G3 stipulates 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 of the Policy. A desktop review of Newham's MOL/Green Belt was undertaken by Jon Sheaff & Associates to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. In accordance with London Plan Policy G3, this			1			H1 Meeting Housing Needs	Homes	Reg18-E-070/070	Aston Mansfield	Reg18-E-070

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	work has been undertaken in consultation with the Mayor and adjoining boroughs. Please see the Newham MOL and Green Belt Review (2024) which evidences our policy approach.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as policies in the Local Plan (GWS1), the London Plan (G1, G2, G3 & G4) and the NPPF help to protect land which hasn't been previously developed, such as Metropolitan Open Land, green belt and green space.	Policy H1.1 All development should be on brownfield land.		1			H1 Meeting Housing Needs	Homes	Reg18-E-040/003	CPRE	Reg18-E-040

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Reg18-E-040	CPRE	Reg18-E-040/004	Homes	H1 Meeting Housing Needs			1.c			<p>This policy should state unequivocally that all protected green space and amenity green space will be retained as such, and that building on green spaces will not be supported in any circumstances.</p>	<p>Comment noted. Please see Newham's Green and Water Infrastructure Study (2024) which is the evidence base to support our policy approach to the borough's green, water, access to nature, play and growing space needs. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.71 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live.</p> <p>Over the Plan period, Newham's population is projected to increase by just over 27 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 61 hectares of additional publicly accessible green space.</p> <p>The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the</p>

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Reg18-E-040	CPRE	Reg18-E-040/024	Homes	H1 Meeting Housing Needs			1.a			<p>Housing 'targets': there is a significant risk of over-allocation of land for new housing – land which could be used for other purposes e.g. to create sustainable transport hubs or new green/open spaces</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Newham has an important role to play in meeting both the borough's and London's wider housing need. If we didn't seek to optimise our future housing delivery to try to meet our London Plan housing target, there is a likelihood the Local Plan may not be found sound when submitted for examination.</p> <p>Other Local Plan policies (see Transport, Green and Water Spaces, and Neighbourhoods themes) seek to ensure we deliver sufficient new green spaces, open spaces and sustainable transport infrastructure to support new housing delivery in the borough. The 'Site Allocation and Housing Trajectory Methodology Note', which forms part of the Local Plan's evidence base also sets out which site allocations were considered suitable for different land uses, and the evidence base documents that were used to inform these decisions.</p>

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Reg18-E-040	CPRE	Reg18-E-040/025	Homes	H1 Meeting Housing Needs			1			<p>There is a large mis-match between the rate of housebuilding proposed and reality of (average) housing completions over recent years</p> <p>The proposed annual housebuilding rate was only achieved in two recent years. On average it significantly outstrips the market delivery rate of recent years:</p> <ul style="list-style-type: none"> • The predicted housing need per annum is roughly 3,050 each year for 17 years • In the past 10 years the average net additional dwellings in Newham was 2,128 per year • In the past 20 years the average net additional dwellings in Newham was 1,540 per year <p>See net additional dwellings Table 122 here. https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing</p> <p>While we do not seek to challenge the figures for need, we must point out the implications of over-allocating land for housing which is very unlikely, in reality, to be built.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Newham has an important role to play in meeting both the borough's and London's wider housing need. If we didn't seek to optimise our future housing delivery to try to meet our London Plan housing target, there is a likelihood the Local Plan may not be found sound when submitted for examination.</p> <p>Furthermore, our new Local Plan housing target is based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. The approach to site phasing is set out within our Site Allocation and Housing Trajectory Methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing.</p>
Reg18-E-040	CPRE	Reg18-E-040/028	Homes	H1 Meeting Housing Needs			1.a			<p>Generally, the over-allocation of land means a great deal of land which could be allocated for other important purposes will lie idle for up to 20 years</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as our new Local Plan housing target is based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. The approach to site phasing is set out within our Site Allocation and Housing Trajectory Methodology note, and</p>

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	provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing.										
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Newham has an important role to play in meeting both the borough's and London's wider housing need. If we didn't seek to optimise our future housing delivery to try to meet our London Plan housing target, there is a likelihood the Local Plan may not be found sound when submitted for examination.</p> <p>Other Local Plan policies (see Transport, Green and Water Spaces, and Neighbourhoods themes) seek to ensure we deliver sufficient new green spaces, open spaces and sustainable transport infrastructure to support new housing delivery in the borough. The 'Site Allocation and Housing Trajectory Methodology Note', which forms part of the Local Plan's evidence base also sets out which site allocations were considered suitable for different land uses, and the evidence base documents that were used to inform these decisions.</p>	Targets should be set at lower, realistic levels to ensure land is not wasted and potential for creating new large parks and green spaces is not lost.		1			H1 Meeting Housing Needs	Homes	Reg18-E-040/029	CPRE	Reg18-E-040

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	A change to this policy approach has not been made. We did not consider this change to be necessary as policy GWS1 seeks to protect green spaces in the borough. The policy only allows for development on these sites in exceptional circumstances where it meets the criteria set out in part 2 of the policy.	Also, if and when green space sites are allocated for housing, the high likelihood is these will be built on first, before brownfield sites, undermining the brownfield first principle.		1.c			H1 Meeting Housing Needs	Homes	Reg18-E-040/030	CPRE	Reg18-E-040
	A change to this policy approach has not been made. We did not consider this change to be appropriate as when the borough fails to meet its housing targets it is at risk of failing the Housing Delivery Test set by the National Planning Policy Framework. Failure of the Housing Delivery Test risks increased 'Planning by appeal', where developers will argue that planning policies requiring us to meet pressing housing needs (such as for affordable housing and family homes) should be afforded less weight in decision-making, given our low levels of overall housing delivery.	Development for the sake of development should not be pursued unless it clearly fulfils the needs of residents and communities.		1			H1 Meeting Housing Needs	Homes	Reg18-E-151/025	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151
	A change to this policy approach has not been made. We did not consider this change to be appropriate as we consider appropriate densities will be secured by applying the design-led approach set out in the London Plan. Newham has an important role to play in meeting both the borough's and London's wider housing need, and we will use the design-led approach (required by policy H1.2) to ensure new developments in Newham deliver appropriate densities in response to their surrounding context.	New housing - Not over dense		2			H1 Meeting Housing Needs	Homes	Reg18-Ae-001/171	East Ham Assembly	Reg18-Ae-001

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Reg18-Ag-001	Green Street Assembly	Reg18-Ag-001/067	Homes	H1 Meeting Housing Needs						[Change] Landlords are abusing the cost of living crisis and there's no cap on rent increases [Originally submitted in relation to Neighbourhoods; Green Street]	<p>This policy approach has now changed to apply the requirement for rents to be capped at Local Housing Allowance Shared Accommodation rates only to those homes secured for Newham Care Leavers and single homeless people secured via Policy H2. This is due to this requirement being too onerous to deliver via a legal agreement for houses in multiple occupation under ten bed spaces. Please see the new wording in H9.1.</p> <p>More broadly we are seeking to address this issue through the provision of more affordable housing through policy H3 (Affordable housing), including in the rented sector.</p>
Reg18-E-130	Hadley Property Group	Reg18-E-130/111	Homes	H1 Meeting Housing Needs			2			Hadley welcomes the recognition that developments should optimise site capacity through a design-led approach taking into account a site's context, capacity for growth and existing and planning supporting infrastructure capacity	Support noted.
Reg18-E-068	Hollybrook Homes	Reg18-E-068/065	Homes	H1 Meeting Housing Needs			1			<p>Draft Policy H1 – Meeting Housing Needs The Emerging Local Plan seeks a net increase of between 46,633 and 52,133 quality homes between 2021 and 2038, the majority of which will be delivered through site allocations, alongside the optimisation of small sites (in accordance with Policy H2 of the London Plan), and windfall sites.</p> <p>We welcome the approach to housing delivery and consider the strategy aligns with national guidance.</p>	Support noted.

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				1			H1 Meeting Housing Needs	Homes	Reg18-E-106/009	Home Builders Federation	Reg18-E-106
	<p>The derivation of the housing requirement for Newham is unclear. The London Plan establishes a ten-year requirement for Newham for 32,800 homes. This is for the ten-year period running from 2019/20 to 2028/29 – see Table 4.1. We recognise that the London Plan is not clear about what local authorities should do when setting new plans with later starting dates, and planning periods longer than ten-years. Newham has said that this is a plan that will operate over 15-years. In this policy it sets a requirement ‘of between 46,633 and 52,133 quality homes between 2021 and 2038’. This is a 17-year period. The Council needs to clarify what period of time its plan will operate over. This is the basis for establishing the requirement.</p> <p>This policy approach has now changed to start Newham's housing target in financial year 2023/24. Please see the new wording in Policy H1. The London Plan and Local Plan housing targets are not required to have the same start dates, and the published Site Allocation and Housing Trajectory Methodology sets out Newham's delivery against the first years of the London Plan period.</p>										

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	A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.	As a minimum, HBF would expect the housing requirement to be to be the ten-year annual average in the London Plan – 3,280dpa – rolled over 15 years, resulting in an overall need for 49,200 homes. We acknowledge that the Council may think differently, although this is what some other boroughs have done (like Lambeth). The London Plan says that for plans extending beyond the decade of the London Plan, boroughs can consider the evidence / indications of capacity in the London SHLAA 2017, and roll forward the small site assumption. The most important thing is to ensure that the full London Plan requirement is planned for and delivered in full the first ten years of Newham's new local plan, especially if it has been operating to old London Plan targets hitherto.		1			H1 Meeting Housing Needs	Homes	Reg18-E-106/010	Home Builders Federation	Reg18-E-106

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-106	Home Builders Federation	Reg18-E-106/011	Homes	H1 Meeting Housing Needs			1	3.13 7		<p>On this matter, it is concerning that the Council will not be delivering the annual average in full for most of the early years of the plan from 2022/23 – 2026/2 – it would be delivering 2,990 which is 290dpa short of the annual average requirement in the London Plan. Given Newham's late start, the new local plan would fail to deliver the full quantum of housing the London Plan requires by 2028/29. It would deliver 21,676 homes. This is somewhat adrift from the 32,800 required by the London Plan.</p> <p>2022/23 2990 2023/24 2990 2024/25 2990 2025/26 2990 2026/27 2990 2027/28 3363 2028/29 3363 Total 21676</p>	<p>A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.</p>

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Reg18-E-106	Home Builders Federation	Reg18-E-106/012	Homes	H1 Meeting Housing Needs			1	3.13 7		Of course, Newham's late start may be rectified later, but the case for a stepped trajectory is much weaker. The Council needs to be doing more to ensure that the London Plan requirement is delivered in full much sooner. The Council will need to state in the Plan what it considers the full requirement to be and what the annual average housing requirement is. The annual average requirement is different from the stepped trajectory figures. This is necessary for monitoring and the planning of the five-year housing land supply (assuming this is still needed) and the Housing Delivery Test.	A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.
Reg18-S-002	Homelessnes forum	Reg18-S-002/001	Homes	H1 Meeting Housing Needs			5			Plan could go further with more innovative forms of housing delivery. Need smaller steps for stair-casing into housing, including smaller homes, group homes, CLTs, self-build.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H1 supports community-led housing, self-build or custom build housing in principle.
Reg18-S-002	Homelessnes forum	Reg18-S-002/002	Homes	H1 Meeting Housing Needs			4			Example of meanwhile use of land for homelessness accommodation in Redbridge provided	A change to this policy approach has not been made. We did not consider this change to be necessary as meanwhile uses will be assessed against policy BFN1.8.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.</p> <p>Regarding the requirements of policy H4, this policy approach has now changed to incorporate greater flexibility around the provision of studio units. These amendments to the policy seek to improve the viability of residential schemes, so they are more able to follow the fast-track route. Please see the new wording in policy H4.</p> <p>However, the comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes,</p>	<p>In this regard, IQL South supports optimising the residential capacity on highly accessible sites, such as IQL South and considers that this approach should be carried through other policies relating to Housing Mix (Policy H4) and Tall Buildings (Policy D4). As currently drafted, Policies H4 and D4 provide requirements that restrict the ability to optimise residential capacity or respond to context in accessible locations where taller buildings are acceptable. Flexibility should be introduced to these policies to support optimising housing delivery on highly accessible sites and to be consistent with draft Local Plan Policies D3 and H1 and London Plan Policy D3.</p>		2			H1 Meeting Housing Needs	Homes	Reg18-E-105/020	IQL South	Reg18-E-105

Comment Response	<p>with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-096	L&Q	Reg18-E-096/011	Homes	H1 Meeting Housing Needs			1			<u>Homes</u> We support the emphasis in the draft Local Plan for in-principle support for new housing across the borough, including small sites and windfall sites (Policy H1).	Support noted.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/069	Homes	H1 Meeting Housing Needs			1			Please - no more flats	A change to this policy approach has not been made. We did not consider this change to be appropriate as flats are one of the housing typologies necessary to help deliver our housing target. Newham has an important role to play in meeting both the borough's and London's wider housing need, and we will use the design-led approach (set out in policy H1.2) to ensure new developments in Newham deliver appropriate densities in response to their surrounding context.
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/013 a	Homes	H1 Meeting Housing Needs			1			Homes H1 - H11 We are pleased to read that the London Borough of Newham aims to deliver between 46,663 and 52,133 new homes over the plan period.	Support noted.
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/013 b	Homes	H1 Meeting Housing Needs			1			Waltham Forest consider that it could be made clearer how this relates to the London Plan target for Newham and evidence of local housing need.	A change to this policy approach has not been made. We did not consider this change to be necessary as our commitment to meeting both local need and London's wider housing need is set out in the introduction to the Homes chapter, and is discussed in further detail in Newham's Site Allocation and Housing Trajectory Methodology note.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. Our new housing target is capacity-based, and seeks to address the concerns with the speed of housing completions in previous years. It includes shortfall against previous years housing delivery. The 'Site Allocation and Housing Trajectory Methodology' Topic Paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.	There is a national need for more housing, and specific to Newham and its most recent fiveyear housing land supply update (2021), it cannot demonstrate a five-year housing land supply. Therefore, paragraph 11(d) of the NPPF would apply in determining planning applications (The presumption in favour of sustainable development).		1			H1 Meeting Housing Needs	Homes	Reg18-E-112/016	Millenium Group	Reg18-E-112
	Comment noted.	Five Year Housing Land Supply The Council's Authority Monitoring Report (AMR) (2021) explains a housing target was of 34,496 new homes between 2018/19 - 2028/29 and is within the London Plan's 10-year housing target (32,800). However, in a five-year supply timespan, the figures fall short at 4.5 years (even with a 5% buffer included). The Council has since adopted a 2020 Action Plan which identifies a range of actions to support delivery in future years, helping to overcome present delivery constraints.		1			H1 Meeting Housing Needs	Homes	Reg18-E-112/035	Millenium Group	Reg18-E-112

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Reg18-E-112	Millenium Group	Reg18-E-112/037	Homes	H1 Meeting Housing Needs			1			Nevertheless, to provide more housing, the release of existing mixed-use allocations should be considered, if more sites are not brought forward for residential allocation	A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.
Reg18-E-112	Millenium Group	Reg18-E-112/040	Homes	H1 Meeting Housing Needs	New site		1			Simply put, the Council will need to allocate more housing sites to address this significant shortfall, and this site is suitable, achievable, and available to assist.	A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.

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Reg18-E-112	Millenium Group	Reg18-E-112/050	Homes	H1 Meeting Housing Needs			1			The Council cannot demonstrate a five-year supply of housing, its development plan policies are out of date and the presumption of sustainable development applies (paragraph 11 of the NPPF).	A change to the policy approach for determining our housing target has not been made. We did not consider this change to be appropriate for the reasons set out within the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. Our new housing target is capacity-based, and seeks to address the concerns with the speed of housing completions in previous years. It includes shortfall against previous years housing delivery. The 'Site Allocation and Housing Trajectory Methodology' Topic Paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.
Reg18-E-019	Network Rail - Bow Goods Yard	Reg18-E-019/011	Homes	H1 Meeting Housing Needs			1			Policy H1: Meeting Housing Needs The principles of draft Policy H1 (Meeting Housing Needs) which sets out how the borough's housing targets will be achieved is supported.	Support noted.
Reg18-E-002	Resident	Reg18-E-002/036	Homes	H1 Meeting Housing Needs			1			I also said before, I am stunned at the numbers of additional people being attracted into the borough (49,000 it seems) and 43,000 new homes to be built.	Comment noted. The housing target in the Regulation 18 Local Plan seeks to deliver between 46,633 and 52,133 new homes across the new Local Plan period.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/020	Homes	H1 Meeting Housing Needs			1			The current policy leads to a disproportionate approval of unaffordable private homes which is in fact leading to the further exclusion of our already mixed and marginalised communities.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-098	Resident	Reg18-E-098/045	Homes	H1 Meeting Housing Needs						3 Private Rented Sector (PRS) Circa 35% of all homes in Newham are in the PRS. This is far too many and leads to environmental degradation because owners /occupiers have no stake in their homes/local environment. The Plan should have specific policies that forbid/discourage more PRS homes.	A change to this policy approach has not been made. We did not consider this change to be appropriate as in the draft Local Plan we have policies on purpose built rented accommodation, houses in multiple occupation and large-scale purpose-built shared living developments, which include quality standards new developments are required to meet. However, we do not have influence over dwelling houses that change to rented accommodation or historic lawful houses in multiple occupation, as these developments do not require planning permission. Separate to the Local Plan, our colleagues in Private Sector Housing are working to improve the standard of homes in the private rented sector, via our landlord licencing scheme.
Reg18-T-002	Resident	Reg18-T-002/063	Homes	H1 Meeting Housing Needs			1			[Change it] I understand the need for more housing	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-010	Resident	Reg18-T-010/002	Homes	H1 Meeting Housing Needs			1			[Change it] [The proposal of developing residential buildings in the Limmo Peninsula has nothing to do with all the ex-housing objectives that it wants to achieve] (and on which I agree).	Comment noted.
Reg18-T-011	Resident	Reg18-T-011/001	Homes	H1 Meeting Housing Needs						[Keep it]	Support noted.
Reg18-T-019	Resident	Reg18-T-019/009	Homes	H1 Meeting Housing Needs			1			[Add to it] Too many homes going to large orgs. Nothing better feedback.	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-033	Resident	Reg18-T-033/002	Homes	H1 Meeting Housing Needs			1			[Change it] I also understand that the proposed developers are CALA Homes, who build luxury housing, and this is very far from being the type of housing needed in Newham now. [NB Comment originally on GSW1]	A change to this policy approach has not been made. We did not consider this change to be appropriate as planning cannot influence who brings a site forward for development. Any developments brought forward in the borough are expected to meet the policy requirements set out within Newham's housing policies, in particular the need to delivery affordable homes (as per Policy H3) and a mix of housing sizes that meet Newham's needs (as per Policy H4).
Reg18-T-034	Resident	Reg18-T-034/024	Homes	H1 Meeting Housing Needs						[Add to it] There needs to be a range of housing available for people with larger families, 2, 3, 4 bedroom properties not just studios and 1 beds.	A change to this policy approach has not been made. We did not consider this change to be necessary as requirements regarding the mix of homes in policy H4 address these concerns. Policies H4.2 and H4.3 seek to prioritise the delivery of family sized homes (with three or more bedrooms), while policies H4.4 and H4.5 seek to limit the delivery of one bedroom and studio units, aligned with our evidence of housing needs.

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Reg18-T-034	Resident	Reg18-T-034/025	Homes	H1 Meeting Housing Needs						[Add to it] People need gardens and access to outside space.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H11 includes requirements for new housing developments to provide access to both private and communal external amenity spaces.
Reg18-T-034	Resident	Reg18-T-034/026	Homes	H1 Meeting Housing Needs						[Add to it] New built and existing properties should be expected to have provision for rubbish and waste off the street so it doesn't impact others.	A change to this policy approach has not been made. We did not consider this change to be necessary as policy W3 (Waste management in developments) requires major residential developments to submit a Waste Management Plan that accords with the requirements of Newham's most up-to-date Waste Management development guidelines. These guidelines require new developments to provide off-street waste management.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space.</p> <p>The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.</p> <p>The Local Plan does not consider this to be a</p>						H1 Meeting Housing Needs	Homes	Reg18-T-035/002	Resident	Reg18-T-035

Comment Response	suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-056	Resident	Reg18-T-056/001	Homes	H1 Meeting Housing Needs			1			<p>[Change it] At the moment in the Newham we have the least publicly accessible green space per person of any London Borough. Provision of play space for children is even worse, with only 10% of the national standard. The Newham population is expected to increase by 2038 by c.100,000 people and so there is the requirement for at least 70 hectares of new open space and parkland and the updated Local Plan has proposals to create this much new open space.</p> <p>However, as you may be aware there are currently plans by the Corporation of London to sell and develop a portion (the "Nursery Site") of the Grade 2 listed West Ham Park to build blocks of flats.</p> <p>As a local resident I am strongly opposed to this development for all the reasons above. We need more open space not less.</p> <p>Therefore, we need the local plan to properly protect our local parks. Unfortunately, on close inspection of this draft Local Plan the Nursery Site is highlighted as an area for potential housing rather than parkland.</p> <p>My request is that this area of open land which has always been part of the park is protected for future generations in the local plan and defined as parkland.</p>	<p>This policy approach has now changed due to the completion of the Green and Water Infrastructure Strategy (2024) and it informing our approach to this site. This extensive piece of evidence base work has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation. As such, the nursery site, in recognition of its Historic Park Status and last lawful use as a nursery site, has been designated as a community growing space. Please see the amendment to the Proposals Map which now designates the West Ham Park as community growing space.</p> <p>The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 14 allotments and community growing spaces with a total area of 16.81 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.046 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.</p> <p>The Local Plan does not consider this to be a</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											<p>suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan.</p>
Reg18-T-057	Resident	Reg18-T-057/027	Homes	H1 Meeting Housing Needs						[Add to it] B	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-082	Resident	Reg18-T-082/009	Homes	H1 Meeting Housing Needs						[Add to it] Those with circumstances that requires new or larger housing should be accessible to those	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan includes requirements for larger and accessible homes, including: - Policy H4, which requires new residential developments on site allocations to provide a minimum of five per cent of proposed homes as four or more bed affordable homes for families (C3 dwelling houses); and - Policy H11, which contains a number of policy clauses related to the provision of well-designed, wheelchair accessible housing.
Reg18-T-088	Resident	Reg18-T-088/007	Homes	H1 Meeting Housing Needs						[Keep it] NO CCTV,	A change to this policy approach has not been made. We did not consider this change to be necessary as improving safety and feelings of safety is addressed through a range of policies in the Local Plan including design policies. Notably, policy D2 sets out that surveillance solutions, such as CCTV, should be targeted only where necessary. This is because Design solutions should be optimised first and foremost before any additional security interventions are considered.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Comment noted. In order to address these issues we have proposed a new portfolio approach to delivering wheelchair adaptable or adapted homes in Policy H11 (Housing Design Quality).</p> <p>It is recognised that in some instances, for example areas of high flood risk, site constraints may preclude wheelchair adapted accommodation being delivered on the ground floor of a development and it may be too expensive for smaller developments to include and maintain a lift. Accordingly, the policy allows for the delivery of a portfolio approach in limited circumstances to help address this issue, in essence allowing for increased delivery of accessible homes (on the ground floor or with lifts) on some sites to make up for lower provision of accessible homes on another, less suitable sites.</p>	[Keep it] in some buildings no lift,					H1 Meeting Housing Needs	Homes	Reg18-T-088/008	Resident	Reg18-T-088
	<p>This policy approach has now changed to incorporate a new policy clause that requires development referable to the Mayor of London to design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study'. This study will consider the design needs of neurodivergent residents, residents with learning disabilities and residents on Newham's housing waiting list. It will also seek to undertake engagement with residents whose access to housing is affected by these design needs. Please see the new wording in Policy H11.</p>	[Keep it] Significant waiting times for housing for child with special needs					H1 Meeting Housing Needs	Homes	Reg18-T-102/003	Resident	Reg18-T-102

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-103	Resident	Reg18-T-103/019	Homes	H1 Meeting Housing Needs						[Change it] Substandard housing should be addressed	Comment noted. Draft Policy H11 (Housing design quality) in the Local Plan seeks to ensures that housing developments are designed for long term comfort and flexibility, and ease of maintenance. The policy seeks to ensure that new homes improve residents' physical and mental health and are designed with adaptability in mind.
Reg18-T-105	Resident	Reg18-T-105/012	Homes	H1 Meeting Housing Needs						[Keep it]	Support noted.

Reg18 -T-108	Resident	Reg18- T- 108/005	Homes	H1 Meeting Housing Needs							<p>[Add to it] Offer more affordable housing for residents who lived here all their lives.</p> <p>The Local Plan addresses this topic through housing policies, particularly those relevant to affordable housing and the delivery of family housing. However, it cannot deliver the change you have requested, as our housing waiting list is managed by the Council's Housing team. We have provided them with your comments.</p> <p>The Council is acutely aware of the shortage of genuinely affordable housing in the Borough, and boosting the supply of social-rented homes is a top priority for the Council. The Council is delivering new social-rented homes through building, acquiring and supporting the delivery of new homes. Over 1,000 social-rented homes were started between 2018 and 2022, and the new target is to build, acquire or support the delivery of 1,500 new social-rented homes by 2026. The economic environment currently makes it extremely challenging to deliver new social-rented homes at scale, but we are committed to using all the tools at our disposal to ensure we meet this commitment.</p> <p>The 37,000 households currently on the housing register is a reflection of the huge scale of housing need in Newham. Between 600 and 800 social-rented properties are let per year, which means that many of those households will never be allocated a council or social-rented property.</p> <p>The way in which social housing is allocated to individual households is set out in the Council's Allocations Policy. This sets out how households bidding for each property are prioritised by the acuteness of a household's housing need rather than simply how long a household has been waiting. This means that even households who have waited over ten or even twenty years may not be successful in bidding if there are households with a higher need. For this reason</p>
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											we encourage households to consider other options besides social-rented housing in Newham, such as looking for social or privately-rented housing in cheaper areas outside London if appropriate.
Reg18-T-116	Resident	Reg18-T-116/001	Homes	H1 Meeting Housing Needs						[Add to it] For residents in blocks, we should be better protected with regards to service charges increases. Or could we maybe have access to legal advice with lower charges?	The policy approach in Policy H11 has now changed to clarify that ensuring affordable housing is of an equivalent quality to private accommodation should not result in a significant increase in the cost of tenants of affordable

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	housing's service charges. Please see the new wording in Policy H11.										
	<p>The Local Plan addresses this topic through policies relevant to housing design quality. However, it cannot deliver the change you have requested. Our website has further information on problems when renting privately (https://www.newham.gov.uk/housing-homes-homelessness/help-problems-renting-privately/2).</p> <p>The Council doesn't manage or regulate the performance of Housing Associations. If you currently rent from a Housing Association, we can however liaise with Housing Associations to respond to particular issues when these are raised, or direct residents to the Housing Ombudsman. We would urge residents to first raise issues with their social landlord, then seek advice from the Housing Ombudsman's website.</p>	<p>[Add to it] Also in our block last year, there was a leakage because of faulty design and our flat filled with water and got uninhabitable. Because the cost was not covered by insurance, my pregnant self, one baby under one year old and my husband had to find alternative accommodation by ourselves at a high demand month and pay everything upfront till finally the building managers would reimburse the expenses. It was a stressful period of time for me and my family and had no one to help out around. It was not a council house so we got no help or advice from the council officers - just one month off from council tax payments.</p>					H1 Meeting Housing Needs	Homes	Reg18-T-116/002	Resident	Reg18-T-116

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as while family housing is the type of accommodation most needed in the borough, the policies recognise there are some areas where the delivery of houses in multiple occupation should be supported to meet the need of single residents. For more intensely occupied larger houses in multiple occupation, these should be directed to Town and Local Centres or along major roads, so as residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing. In the majority of cases, the delivery of houses in multiple occupation should not result in the conversion of family-sized accommodation, with the exception of the policy requirements of policy H2.</p> <p>If you experience issues of anti-social behaviour concerning a particular property, our colleagues are able to help, and reports can be made on Newham's website https://www.newham.gov.uk/public-health-safety/anti-social-nuisance-behaviour.</p>						H1 Meeting Housing Needs	Homes	Reg18-T-126/008	Resident	Reg18-T-126

Reg18 -E-069	Silvertown Homes Ltd	Reg18- E- 069/024	Homes	H1 Meeting Housing Needs			1		<p>C) Strategic Housing Market Assessment (SHMA)</p> <p>The Newham SHMA was published in June 2022. Its stated purpose is to provide a sound evidence base to inform LBN's new Housing Strategy and emerging new Local Plan (covering the period 2021 to 2038)3. To that end it addresses two key matters, housing need and housing mix.</p> <p>Newham's assessment of overall housing need is based on local trends, effectively, the latest local household projections (published in 2020), plus an uplift to address suppressed household formation. 3 [Footnote text: SHMA page 6, paragraph i.] Thus, Newham is assessed to have a need for 55,872 homes over the period 2021 to 2038. An annual average of 3,287 dwellings per annum.</p> <p>The SHMA acknowledges that the London Plan requirement for Newham, including that part which falls within LLDC, is 4,760 and notes that this figure broadly aligns with PPG standard method local housing need of 4,709 dwellings per annum).</p> <p>On an annualised basis, the SHMA local housing need assessment is significantly lower (1,473 or 31%) than the London Plan requirement. The capacity based draft Local Plan requirement is lower still, ranging from 2,743 to 3,067 dwellings per annum (46,633 to 42,133 homes in total).</p> <p>Thameside West accounts for about 9% of the SHMA's local needs assessment and between 10% and 11% of the Draft Local Plan Target. A significant proportion of locally identified need and capacitybased targets and as such, critical to their delivery.</p> <p>Table 1: Newham Local Housing Need and</p>	Comment noted.
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										<div>Housing Targets<ul style="list-style-type: none">• SHMA LHN: 3,287• Draft Local Plan Target: 2,743 to 3,067• London Plan Target: 4,760</div>	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	Comment noted. The published Site Allocation and Housing Trajectory Methodology note that supports the Local Plan sets out the methodology used to inform the phasing of site allocations in the housing trajectory.	<p>H) Representations - Site Allocation and Housing Trajectory Methodology (SA&HTM)</p> <p>Table 12 - 5YHLS</p> <p>The Thameside West site is included in LBN’s Housing Trajectory as delivering 200 homes during 2025/2026 and 200 homes during 2026/2027. However, this trajectory (Table 12) should be amended to:</p> <ul style="list-style-type: none">• Reflect that fact that these 400 homes in Phase 1 should be delivered earlier than LBN anticipates; and• Reflect the delivery of 473 homes from the outline part (phase 2) of the Thameside West site, as summarised in the table below: <p>Recommendation</p> <p>SHL suggests that LBN’s 5 Year Housing Supply table (table 12), which is based on completions, is amended as follows: [See inserted table].</p> <p>SHL also suggests that Tables 9 and 10 of the SA&HTM should be amended to take account of the above.</p>		1				H1 Meeting Housing Needs	Homes	Reg18-E-069/048	Silvertown Homes Ltd	Reg18 -E-069

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. We note, as per the Government's recently published "Government response to the local housing need proposals in "Changes to the current planning system" ", the government have specified that the local housing need uplift for London will only be applicable once the next London Plan is being developed. Given the need for the draft Local Plan to be in general conformity with the London Plan, the standard method has not been used to inform calculations of housing need or the proposed housing requirement in the new Local Plan.	The Berkeley Group notes that LBN has the second highest housing target in London with a requirement to deliver 32,800 new homes over a ten year period as set out in the adopted London Plan (2021). Furthermore, following the publication of the New Standard Methodology in December 2020, the housing target for Newham (inclusive of LLDC) is in fact noted as 48,820 over the ten year period. In correspondence between the Secretary of State and the Mayor of London in the lead up to the adoption of the London Plan, the Secretary of State urged the Mayor to undertake a review of the Plan as soon as possible in order to account for this New Standard Methodology. This is in line with the requirements of the National Planning Policy Framework which seeks to significantly boost the supply of housing (paragraph 60) and ensure strategic policies are informed by local housing need assessment, conducted using the standard method in national planning guidance in order to determine the minimum number of homes needed (paragraph 61).		1			H1 Meeting Housing Needs	Homes	Reg18-E-136/101	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	The Site Allocation and Housing Trajectory Methodology Note which was published as part of the evidence base to the Local Plan Refresh in December 2022 also notes that Newham only has a five year land supply of 2.69 years (paragraph 4.6.2). It is therefore clear that there is an acute need for housing in LBN both in terms of the number of homes needed but also in terms of meeting local need. The Berkeley Group considers that all of their sites, strategic sites within the adopted and emerging Local Plan, provide a significant opportunity in assisting Newham with meeting this substantial housing shortfall as well as delivering housing in the borough that will meet local housing need.		1			H1 Meeting Housing Needs	Homes	Reg18-E-136/102	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	Comment noted.	Gasworks sites fall within the broader category of 'surplus utility sites within the adopted London Plan and are identified as one of the six strategic sources of housing (Policy H1). Policy H1 of the London Plan is about increasing housing supply and requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites including specifically the six strategic sources of housing.		1			H1 Meeting Housing Needs	Homes	Reg18-E-136/103 a	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				1	3.134		H1 Meeting Housing Needs	Homes	Reg18-E-136/104	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	Support noted.	The Sites therefore represent a unique opportunity in the borough to deliver much needed housing on Site's located within key growth areas, that are accessible and that have been identified for transformation and that are able to support the creation of new neighbourhoods in the borough in line with the 15 minute city concept. Furthermore, these developments have the potential to deliver a series of environmental, social and economic benefits for local residents and workers including making a positive contribution to Newham's residents' health and wellbeing. The Berkeley Group therefore fully supports Newham's desire to speed up construction and optimise the delivery of homes on both small and large sites (paragraph 3.134).									
	Support noted.	As noted above, there is an acute need for housing in LBN and LBN plays a strategic role in the delivery of housing within London. The Berkeley Group therefore fully supports the approach outlined in Policy H1 which seeks to enable a net increase of between 46,633 and 52,133 quality homes between 2021 and 2038 by delivering the majority of new housing on site allocations, ensuring developments follow a design-led approach to optimise site capacity.		1			H1 Meeting Housing Needs	Homes	Reg18-E-136/105	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H1 Meeting Housing Needs	Homes	Reg18-E-124/010	Stratford East London Partners LLP	Reg18-E-124

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							H1 Meeting Housing Needs		Reg18-T-063/001	Student	Reg18-T-063
	<p>This policy approach has now changed to apply the requirement for rents to be capped at Local Housing Allowance Shared Accommodation rates only to those homes secured for Newham Care Leavers and single homeless people secured via Policy H2. This is due to this requirement being too onerous to deliver via a legal agreement for houses in multiple occupation under ten bed spaces. Please see the new wording in H9.1.</p> <p>More broadly we are seeking to address this issue through the provision of more affordable housing through policy H3 (Affordable housing), including in the rented sector. Requirements in policies H9 and H11 should also help address these concerns. This includes the need for accommodation to have a management plan. These concerns will also be partly addressed through the borough's landlord licencing scheme, which requires rented properties in the borough to meet required quality standards.</p>										
	Support noted.	<p>Draft Policy H1: Meeting Housing Needs</p> <p>The proposed target of delivering between 46,633 and 52,133 new homes between 2021 and 2038 is supported, and it is recognised that the majority of new housing will be brought forward on Site Allocations.</p>		1			H1 Meeting Housing Needs	Homes	Reg18-E-080/031a	Transport Trading Limited Properties Limited	Reg18-E-080

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/031b	Homes	H1 Meeting Housing Needs			1			[Draft Policy H1: Meeting Housing Needs The proposed target of delivering between 46,633 and 52,133 new homes between 2021 and 2038 is supported, and it is recognised that the majority of new housing will be brought forward on Site Allocations.] However, no details of the proposed housing trajectory or expectations of housing numbers which can be delivered on site allocations have been published alongside the Draft Local Plan consultation, and it is requested that such evidence is shared for us to be able to interrogate the Council's assumptions on housing delivery.	A change to this policy approach has not been made. We did not consider this change to be appropriate as this information should remain sensitive. However, in order for the underlying assumptions that have informed the housing trajectory to be interrogated we have published the 'Site Allocation and Housing Trajectory Methodology' Topic Paper. This topic paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. We welcome the discussions held with the GLA to date, which have set out the challenges of delays to schemes phasing. These have had a significant impact on our ability to meet our London Plan housing target. Our shortfall against the London Plan 2021 housing target is also discussed in Duty to Cooperate statements.
Reg18-E-102	Unibail-Rodamco-Westfield	Reg18-E-102/006	Homes	H1 Meeting Housing Needs			1.a			We note that the draft Plan proposes to deliver between 46,633 and 52,133 new homes between 2021 and 2038 and welcome the focus on Site Allocations to deliver the majority of this in draft Policy H1 (Meeting housing needs).	Comment noted.
Reg18-E-050	Anchor	Reg18-E-050/017b	Homes	H2 Protecting and Improving Existing Housing			1			The requirement to replace social rent housing with an equivalent amount of social rent floorspace in Policy H2 should also be subject to viability to ensure that it is effective.	A change to this policy approach has not been made. We did not consider this change to be necessary as policy H8.E of the London Plan requires all development proposals that include the demolition and replacement of affordable housing to submit a viability appraisal.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-070	Aston Mansfield	Reg18-E-070/071	Homes	H2 Protecting and Improving Existing Housing						b. H2 Protecting and Improving Existing Housing - Would you keep, change or add something to this policy? No Comment	Comment noted.
Reg18-Ae-001	East Ham Assembly	Reg18-Ae-001/172	Homes	H2 Protecting and Improving Existing Housing			1			Repairs and improvements/conversions - no smaller units	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy H2 seeks to support the protection of family-sized homes with three or more bedrooms. While the policy does set out some exceptional circumstances where conversion of family homes to smaller units will be acceptable, it is considered these circumstances would have more desirable outcomes than retaining the existing accommodation.
Reg18-Ae-001	East Ham Assembly	Reg18-Ae-001/176	Homes	H2 Protecting and Improving Existing Housing						Repairs and improvements/conversions - treat RSLs as developers	A change to this section has not been made. We did not consider this change to be necessary as Registered Social Landlord will be required to meet relevant requirements of the Local Plan in the same way that a private developer would. Planning permissions are applicable to specific areas of land rather than individual applicants, so it is important planning policies are applied consistently, regardless of who a developer is.
Reg18-S-002	Homelessness forum	Reg18-S-002/009	Homes	H2 Protecting and Improving Existing Housing			5.b		H2.5	Question if nomination rights for HMOs secured for people in or due to be placed in temporary accommodation are solely for LBN.	This policy approach has now changed to clarify the circumstances under which family homes can be converted for a temporary period to a House in Multiple Occupation for the sole use by Newham's Homelessness service for single homeless residents or people who are owed a homelessness duty. The policy approach was originally introduced under the Regulation 18

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Local Plan to help address the significant number of people in temporary accommodation in the borough. Please see the new wording in policy H2.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H2 largely reflects the position set out in policy H8 (Loss of existing housing and estate redevelopment) of the London Plan. Policy H3 is also supportive of the role estate regeneration plays in helping to meet housing need.	However, more could be done to help facilitate the various ways RPs can achieve this. Policy H2 is quite restrictive toward estate regeneration / changes to existing residential. A stronger emphasis on estate regeneration and infill would be helpful in supporting both LBN and RPs in optimising site capacity to provide more affordable homes, whilst improving the quality of open spaces and community facilities. This is becoming more important with the push towards net zero and the life cycle of existing homes, requiring a more radical approach to reinvestment during the life of the Local Plan.		1			H2 Protecting and Improving Existing Housing	Homes	Reg18-E-096/013	L&Q	Reg18-E-096

Reg18 -E-031	National Residential Landlords Association	Reg18- E- 031/001	Homes	H2 Protecting and Improving Existing Housing			2		<p>I wish to comment on the proposals to restrict HMOs outlined on p169.</p> <p>In addition to the situations where HMOs are permitted, I would like LLAS and NRLA accredited landlords to be allowed to let small shared house HMOs with 3-4 people.</p> <p>I outline how this might work in the attached paper.</p> <p>Landlords like me who own 3-4 bed houses need the flexibility to be able to let to sharers for a time and then a family another time. Tenants also benefit from flexibility of housing stock particularly as the private rented sector is now shrinking due to government policy.</p> <p>I also attach a discussion document [see attachment] I wrote in 2016 for the then Newham Landlord Focus Group which describes how 3-4 sharers live as a family. This can be a vital means for young people to afford housing in London. It can also help with regeneration as they will be more likely to spend at local amenities in the locality. An extended family of 10 people can present more challenges to a neighbourhood than 3-4 sharers. The restriction on shared housing can be detrimental to LGBT communities (and other groups) who may struggle to live with discriminatory families and feel safer forming their own family of friends.</p> <p>My proposal suggests restricting this measure to accredited landlords to ensure high standards and that the relaxation of restrictions is not abused and can be monitored.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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												<p>housing need in the borough, it is important that Local Plan policies continue to protect family-sized dwellings from conversion. However, while the family housing is the type of accommodation most needed in the borough, the policies recognise there are some areas where the delivery of houses in multiple occupation should be supported to meet the need of single residents. For more intensely occupied larger houses in multiple occupation, these should be directed to Town and Local Centres or along major roads, so as residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing. In the majority of cases, the delivery of houses in multiple occupation should not result in the conversion of family-sized accommodation, with the exception of the policy requirements of policy H2.</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/038	Homes	H2 Protecting and Improving Existing Housing						2 Repairs and Improvements/Conversion These areas are not adequately covered in the DP.	A change to this policy approach has not been made. We did not consider this change to be appropriate as repairs and improvement works often don't require planning permission. Where repairs and improvement works or conversions require planning permission, proposals will be expected to meet the relevant policy requirements of the Local Plan, including policy H11 requirements around housing design quality.
Reg18-K-037	Resident	Reg18-K-037/007	Homes	H2 Protecting and Improving Existing Housing			1. All housing, with the exception of purpose-built			Let's make Newham low carbon and assist residents to install solar panels on every property and business to generate electricity. [Originally submitted on comment on H2.1]	The Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. Improvements to biodiversity should be directed elsewhere (such as ground level landscaping). The evidence base does note that some roof area can be used for plant equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation.
Reg18-T-011	Resident	Reg18-T-011/002	Homes	H2 Protecting and Improving Existing Housing						[Keep it]	Support noted.
Reg18-T-019	Resident	Reg18-T-019/010	Homes	H2 Protecting and Improving Existing Housing						[Add to it] Not comfortable with that is plan	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/027	Homes	H2 Protecting and Improving Existing Housing			2			[Add to it] There needs to be a range of housing available for people with larger families, 2, 3, 4 bedroom properties not just studios and 1 beds.	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>
Reg18-T-034	Resident	Reg18-T-034/028	Homes	H2 Protecting and Improving Existing Housing						People need gardens and access to outside space.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan includes requirements for the provision of private amenity space for new homes under policy H11. Other policies in the plan related to Green and Water Spaces and Neighbourhoods also seek to address these concerns by helping to protect and improve residents' access to open spaces.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/029	Homes	H2 Protecting and Improving Existing Housing						New built and existing properties should be expected to have provision for rubbish and waste off the street so it doesn't impact others.	A change to this policy approach has not been made. We did not consider this change to be necessary as policy W3 (Waste management in developments) requires major residential developments to submit a Waste Management Plan that accords with the requirements of Newham's most up-to-date Waste Management development guidelines. These guidelines require new developments to provide off-street waste management.
Reg18-T-044	Resident	Reg18-T-044/007	Homes	H2 Protecting and Improving Existing Housing						[Change it] I would like to see the 3 towers of the carpenters state refurbished and not demolished. It generates less money for a few but also less emissions for all.	A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation is consistent with the submitted outline planning application and masterplan for the site. The development principles for site allocation N8.SA3 (Greater Carpenters District) set out the support for new residential development on the site, including refurbishment.
Reg18-T-057	Resident	Reg18-T-057/028	Homes	H2 Protecting and Improving Existing Housing						[Add to it] J	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-074	Resident	Reg18-T-074/005	Homes	H2 Protecting and Improving Existing Housing						[Add to it] Flat with door that get wet should have canopy stop swelling when it get wet	A change to this policy approach has not been made. We did not consider this change to be appropriate as this is a detailed design requirement that will be assessed as part of an application for planning permission.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as improving safety and feelings of safety is addressed through a range of policies in the Local Plan including design policies. Notably, policy D2 sets out that surveillance solutions, such as CCTV, should be targeted only where necessary. This is because Design solutions should be optimised first and foremost before any additional security interventions are considered.						H2 Protecting and Improving Existing Housing	Homes	Reg18-T-088/009	Resident	Reg18-T-088
	Comment noted. In order to address these issues we have proposed a new portfolio approach to delivering wheelchair adaptable or adapted homes in Policy H11 (Housing Design Quality). It is recognised that in some instances, for example areas of high flood risk, site constraints may preclude wheelchair adapted accommodation being delivered on the ground floor of a development and it may be too expensive for smaller developments to include and maintain a lift. Accordingly, the policy allows for the delivery of a portfolio approach in limited circumstances to help address this issue, in essence allowing for increased delivery of accessible homes (on the ground floor or with lifts) on some sites to make up for lower provision of accessible homes on another, less suitable sites.						H2 Protecting and Improving Existing Housing	Homes	Reg18-T-088/010	Resident	Reg18-T-088

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-088	Resident	Reg18-T-088/011	Homes	H2 Protecting and Improving Existing Housing						[Change it] we are spending budget on parks, roads and other places but not on right places	A change to this policy approach has not been made. We did not consider this change to be necessary as Council spending on roads, parks and regeneration projects are subject to residential engagement. We welcome views on the best way to spend Council resources, and you can find out more information at the following link - https://www.newham.gov.uk/council/people-powered-places .
Reg18-T-103	Resident	Reg18-T-103/020	Homes	H2 Protecting and Improving Existing Housing			1			[Keep it] This should be protected	Comment noted.
Reg18-T-105	Resident	Reg18-T-105/013	Homes	H2 Protecting and Improving Existing Housing						[Keep it]	Support noted.
Reg18-T-108	Resident	Reg18-T-108/006	Homes	H2 Protecting and Improving Existing Housing						[Add to it] Not having to wait more than 4 weeks for repairs	The Local Plan addresses this topic through housing policies. However, it cannot deliver the change you have requested. Our colleagues in the housing department are able to help. The Council have begun a series of improvements to the repairs service for Council properties which has seen response times, the number of appointments kept and resident satisfaction all improve. We have also made changes to the call centre which means more calls are answered the first time and callers spend less time on hold. Residents should already be starting to see

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											<p>improvements in the waiting time for repairs over 2024.</p> <p>We have also provided the housing team with your comments.</p>
Reg18-T-126	Resident	Reg18-T-126/010	Homes	H2 Protecting and Improving Existing Housing						[Add to it]	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/136	Homes	H2 Protecting and Improving Existing Housing			5			[Add] Prioritise temporary housing to bring down the costs to the council for hotels (maybe less hotels?)	This policy approach has now changed to clarify the circumstances under which family homes can be converted for a temporary period to a House in Multiple Occupation for the sole use by Newham's Homelessness service for single homeless residents or people who are owed a homelessness duty. The policy approach was originally introduced under the Regulation 18 Local Plan to help address the significant number of people in temporary accommodation in the borough. Please see the new wording in policy H2.
Reg18-T-063	Student	Reg18-T-063/004	Homes	H2 Protecting and Improving						[Keep it]	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							Existing Housing				
	A change to this policy approach has not been made. We did not consider this change to be appropriate for the reasons set out in the 'Specialist housing for older people topic paper', which discusses in further detail the need for affordable housing for older residents.	The 2022 SHMA identifies a need for 608 rented homes for older people by 2038 but, more significantly, 3,491 homes for ownership across the same period. There should be an exception to the 65% social rent and 35% intermediate requirement within Policy H3 for older persons' housing given the evidence around need.		2.b			H3 Affordable housing	Homes	Reg18-E-050/017a	Anchor	Reg18-E-050
	A change to this policy approach has not been made. We did not consider this change to be appropriate for the reasons set out in the 'Specialist housing for older people topic paper', which discusses in further detail the need for affordable housing for older residents.	We would also encourage flexibility within Policy H3 to allow affordable rents rather than social rents where required for viability.		2.b			H3 Affordable housing	Homes	Reg18-E-050/017c	Anchor	Reg18-E-050

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-070	Aston Mansfield	Reg18-E-070/072	Homes	H3 Affordable housing			1			<p>c. H3: Affordable Housing - Would you keep, change or add something to this policy? <i>50 per cent of all new homes delivered across the Plan period to be affordable housing</i> Support: The importance of Affordable Housing is recognised. The policy is in line with the London wide London Plan target of 50% across the capital.</p> <p>It is well documented by the London Plan that there is a shortage of affordable homes for Londoners. The development of Lady Trower Playing Fields would provide such an opportunity to contribute towards London's development needs with the provision of much needed family and affordable housing. It would therefore be compliant with the NPPF principles of sustainable development.</p>	Comment noted.
Reg18-E-077	Ballymore Group	Reg18-E-077/024	Homes	H3 Affordable housing			2			<p>Ballymore strongly supports the use of the threshold approach as set out in the London Plan in determining the required level of affordable housing on a site. Ballymore also supports the proposed 65/35 split between social rent housing and intermediate homes. It should be made clear within the policy that the affordable housing percentage is calculated on a habitable room basis, rather than units, in accordance with the London Plan.</p>	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.

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	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	Affordable Housing Policy H3 of the draft plan notes that new residential development with the capacity for ten units of more should provide the percentage of affordable housing required through the threshold approach as set out within Policy H5 of the London Plan (2021). It is further noted that locally the tenure split should be 65% social rent housing and 35% intermediate homes. Bellway supports this policy, subject to viability testing to ensure delivery of housing is not stifled by policy.		2			H3 Affordable housing	Homes	Reg18-E-108/029	Bellway Homes Limited	Reg18-E-108
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	[we nonetheless have concerns, that the draft local plan does not go nearly far enough. These relate principally to;] 1. social housing, where the draft plan does not include the Majority Party manifesto commitment of 50% social housing on all new build sites,		2.b			H3 Affordable housing	Homes	Reg18-E-151/005	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

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	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Please note, the London Plan policy (H4) sets a strategic target of 50% of all homes delivered in London to be affordable. It seeks to deliver this strategic target through requiring developments of 10 or more homes on publically owned or industrial land to deliver 50% of the homes as affordable (policy H5) of which 30% should be low-cost rented homes, 30% intermediate homes and the remaining 40% to be determined by the borough (policy H5).</p> <p>On all other sites of 10 or more homes 35% of the homes should be affordable (policy H5), of which 30% should be low-cost rented homes, 30% intermediate homes and the remaining 40% to be determined by the borough (policy H5).</p>	<p>Social housing</p> <p>The fundamental weakness of the draft plan is the lack of a commitment to 50% social housing on all development sites. This is its major omission which must be remedied if the plan is to have any credibility in the community. There is a desperate need for more social housing in Newham.</p> <p>The London Plan sets out a 50 % requirement for affordable housing and 60% in the case of strategic partners and also says that large developments including strategic sites should contain 60% affordable housing target requirements.</p>		2.b			H3 Affordabl e housing	Homes	Reg18-E-151/010	<p>Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin</p>	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Comment noted. The policy approach in Policy H2 has now changed to clarify the circumstances under which family homes can be converted for a temporary period to a House in Multiple Occupation for the sole use by Newham's Homelessness service for single homeless residents or for people who are owed a homelessness duty. The policy approach was originally introduced under the Regulation 18 Local Plan to help address the significant number of single people in temporary accommodation in the borough. Please see the new wording in policy H2. Policy H6 also sets out policy requirements relevant to the provision of more specialist and supported forms of accommodation for homeless people and rough sleepers. The location and quality of these forms of housing should be informed in discussion with relevant commissioning teams in the Council.</p> <p>Separate to the Local Plan, our colleagues in the Adults and Health and Housing directorates in the Council work with residents who are, or are at risk of, rough sleeping or homelessness, including through our Homelessness Prevention and Advice Service (HPAS). Newham also has a published Homelessness and Rough Sleeping Strategy 2021-2026, which sets out an intelligence-led, public health approach to tackling homelessness, and improving access to, and the quality of, housing within the borough.</p>	Significant numbers of people in Newham are on the waiting list for council housing and nearly 6000 households are in temporary accommodation (TA). The Council's base budget for TA has increased by £15m in 2023/4 to reflect this need.					H3 Affordable housing	Homes	Reg18-E-151/013	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/014	Homes	H3 Affordable housing			2.b			House building in the borough is not keeping pace with the need for affordable housing, and overall social housing lets in London and Newham have been steadily falling over the past decade.	Comment noted. The 'Site Allocation and Housing Trajectory Methodology' Topic Paper sets out the approach we have taken to optimising housing delivery in line with the design-led approach, while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. We welcome the discussions held with the GLA to date, which have set out the challenges of delays to schemes phasing. These have had a significant impact on our ability to meet our London Plan housing target.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/015	Homes	H3 Affordable housing						The Plan should mention "vacancy chain", this refers to the overall sequences of homes made available for social housing: as one household vacates an existing social home and subsequently re-lets then rehouses another household until new social housing vacancy is formed.	A change to this policy approach has not been made. We did not consider this change to be necessary as the evidence of housing need that has informed our housing mix targets already takes this into consideration. This evidence is the basis for our requirement for site allocations to deliver a minimum of 5 per cent of their housing units as affordable four bedroom properties, as well as our family housing target. This requirement, along with other initiatives led by housing colleagues, should help to reduce issues of overcrowding in the borough.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben,	Reg18-E-151/016	Homes	H3 Affordable housing						A proportion of new council homes should be used to rehouse vulnerable households in temporary accommodation or at risk of homelessness.	The Local Plan addresses this topic through housing policies. However, it cannot deliver the change you have requested. Our colleagues in housing manage the allocation of Council homes. All social rent homes delivered in the borough

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	will be allocated to people on Newham's housing waiting list. The way in which social housing is allocated to individual households is set out in the Council's Allocations Policy.									Cllr Master, Cllr Sarley Pontin	
	<p>A change to this policy approach has not been made. We believe this comment refers to the 'bottom-up' viability model referenced in the report published by the Housing and Finance Institute. We did not consider this change to be appropriate as the Local Plan viability assessment must follow national and GLA guidance to meet regulatory requirements for Local Plans.</p> <p>Please note, the current viability assessment process doesn't consider the price paid for land. Instead, a comparison is made of the value of the land in its current use, versus the value that could be achieved if the site were to be redeveloped. To ensure a landowner would be willing to bring the site forward for the intended use, the value of the land when redeveloped must be worth more than the current value of the land plus the cost of redeveloping it.</p> <p>In addition, the authors of the report acknowledge that if this alternative model is to work there would need to be very significant grant available to fund developments, as the delivery of private homes would not be able to subsidise the level of affordable housing needed. Given the limited grant available to fund affordable housing, we could not adopt this model within the current planning and grant</p>	In addition, 'bottom-up' viability models should be used to boost council social housing delivery.					H3 Affordable housing	Homes	Reg18-E-151/019	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>system. The Local Plan policies require the delivery of the maximum achievable level of affordable housing without grant. If grant were to increase, additional affordable housing could be delivered and would be supported by the Local Plan.</p> <p>With regards to our housing policies in the draft Local Plan, these have been shaped by detailed evidence of housing needs in the borough. The targets in the Local Plan to deliver social rent homes should help to meet the needs identified in our evidence base for affordable housing.</p>										
	<p>Comment noted. To address this phenomenon the Local Plan includes policies to deliver affordable housing across the borough; to increase the number of affordable retail units in new town centres (so independent and local business can afford to open in them); creating greater flexibility on where smaller community facilities can be located, so they are in areas where it may be cheaper to rent or purchase space and located more evenly across the borough; to require developments delivering space for businesses to sign up to the Community Wealth Building pledges and provide priority access to jobs and fund training for local residents; to ensure new community facilities are accessible to all residents and are designed to meet the needs of the local community. This is supported by the delivery of the 15 minute neighbourhood principle which insures greater ease of access to facilities by walking and cycling,</p>	<p>As poorer families are less likely to have the cars that are vital to support transport around shift work, a failure to provide social and affordable housing means that not only are poorer residents unable to stay and live in our borough, but they are unable to fill the gaps in much needed local professions such as homecare, cleaning and GP receptionists, adding to the shortfall of such roles.</p>		1			H3 Affordable housing	Homes	Reg18-E-151/026	<p>Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin</p>	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	as well as the focus in the plan on improving local connections and public transport.										
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. All viability assessments will be robustly scrutinised and review mechanisms put in place, as per requirements set out in BFN4.</p>							Homes	Reg18-E-151/032	<p>CLlr Islam, CLlr Beckles, CLlr Choudhury, CLlr Corben, CLlr Master, CLlr Sarley Pontin</p>	Reg18-E-151
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p>							H3 Affordable housing	Reg18-E-151/034	<p>CLlr Islam, CLlr Beckles, CLlr Choudhury, CLlr Corben, CLlr Master, CLlr Sarley Pontin</p>	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the Local Plan viability assessment must follow national and GLA guidance to meet regulatory requirements for Local Plans.</p> <p>Please note, the current viability assessment process doesn't consider the price paid for land. Instead, a comparison is made of the value of the land in its current use, versus the value that could be achieved if the site were to be redeveloped. To ensure a landowner would be willing to bring the site forward for the intended use, the value of the land when redeveloped must be worth more than the current value of the land plus the cost of redeveloping it.</p> <p>In addition, the authors of the report acknowledge that if this alternative model is to work there would need to be very significant grant available to fund developments, as the delivery of private homes would not be able to subsidise the level of affordable housing needed. Given the limited grant available to fund affordable housing, we could not adopt this model within the current planning and grant system. The Local Plan policies require the delivery of the maximum achievable level of affordable housing without grant. If grant were to increase, additional affordable housing could be delivered and would be supported by the Local Plan.</p>	<p>Critically a bottom-up viability model should be adopted to support social housing. The traditional viability appraisal model for schemes needs to be 'flipped' to calculate upfront the percentage of private homes needed on a site to produce the type of social housing the council needs. (Please see the report produced by the Housing and Finance Institute related to public rental homes.)...</p> <p>The local Public Rental Sector (PRS) strategy is the council's waiting list, which has within it the size of households on the list and their ability to pay the proposed rent form. The responsibility of the council is to identify sites that might meet these criteria and initiate discussions with developers.</p> <p>Currently housebuilders work out how many social/affordable homes of various grades they must concede to arrive at an acceptable value for the land on which they wish to build private homes. The Institute proposes that councils in cooperation with a developer, work out how many private homes built for sale are needed to viably build homes that can be rented at rates those on the waiting list can afford. It is important to flip 'top-down' targets over and into 'bottom up' plans.</p>		2.b			H3 Affordable housing	Homes	Reg18-E-151/035	<p>Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin</p>	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	With regards to our housing policies in the draft Local Plan, these have been shaped by detailed evidence of housing needs in the borough. The targets in the Local Plan to deliver social rent homes should help to meet the needs identified in our evidence base for affordable housing.										
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the Local Plan viability assessment must follow national and GLA guidance to meet regulatory requirements for Local Plans.</p> <p>Please note, the current viability assessment process doesn't consider the price paid for land. Instead, a comparison is made of the value of the land in its current use, versus the value that could be achieved if the site were to be redeveloped. To ensure a landowner would be willing to bring the site forward for the intended use, the value of the land when redeveloped must be worth more than the current value of the land plus the cost of redeveloping it.</p> <p>In addition, the authors of the report acknowledge that if this alternative model is to work there would need to be very significant grant available to fund developments, as the delivery of private homes would not be able to subsidise the level of affordable housing needed.</p>	<p>Critically a bottom-up viability model should be adopted to support social housing. The traditional viability appraisal model for schemes needs to be 'flipped' to calculate upfront the percentage of private homes needed on a site to produce the type of social housing the council needs. (Please see the report produced by the Housing and Finance Institute related to public rental homes.)...</p> <p>The local Public Rental Sector (PRS) strategy is the council's waiting list, which has within it the size of households on the list and their ability to pay the proposed rent form. The responsibility of the council is to identify sites that might meet these criteria and initiate discussions with developers.</p> <p>Currently housebuilders work out how many social/affordable homes of various grades they must concede to arrive at an acceptable value for the land on which they wish to build private homes. The Institute proposes that councils in cooperation with a developer, work</p>		2.b			H3 Affordable housing	Homes	Reg18-E-151/036	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Given the limited grant available to fund affordable housing, we could not adopt this model within the current planning and grant system. The Local Plan policies require the delivery of the maximum achievable level of affordable housing without grant. If grant were to increase, additional affordable housing could be delivered and would be supported by the Local Plan.</p> <p>With regards to our housing policies in the draft Local Plan, these have been shaped by detailed evidence of housing needs in the borough. The targets in the Local Plan to deliver social rent homes should help to meet the needs identified in our evidence base for affordable housing.</p>	<p>out how many private homes built for sale are needed to viably build homes that can be rented at rates those on the waiting list can afford. It is important to flip 'top-down' targets over and into 'bottom up' plans.</p>									
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>However, the mix of 65:35 social rent/intermediate might not always be the most appropriate mix for all sites in the Borough.</p>		2.b			H3 Affordable housing	Homes	Reg18-E-130/113	Hadley Property Group	Reg18-E-130

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	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2.b			H3 Affordable housing	Homes	Reg18-E-130/114	Hadley Property Group	Reg18-E-130
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2.b			H3 Affordable housing	Homes	Reg18-E-130/115	Hadley Property Group	Reg18-E-130

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	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3. Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p> <p>Developments delivering above 60 per cent affordable housing should still seek to meet the tenure mix requirements of Policy H2.2 as a minimum (50% of the total units being social rent). Affordable homes delivered above the requirements of part 2 of the policy may be delivered as intermediate homes.</p>			2.b			H3 Affordable housing	Homes	Reg18-E-130/116	Hadley Property Group	Reg18-E-130

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Reg18-E-068	Hollybrook Homes	Reg18-E-068/067	Homes	H3 Affordable housing	N8.SA 10 Chobham Farm North		2.a			<p>Draft Policy H3 – Affordable Housing Draft Policy H3 seeks for affordable housing to be delivered in accordance with the threshold approach as prescribed in Policy H5 of the London Plan i.e 50% for public sector land, Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses where the scheme would result in a net loss of industrial capacity and 35% on all other sites</p> <p>We wish to identify that where land is partly in public and partly in private ownership and where the part of the site that is in private ownership does not serve an industrial function, a pragmatic approach should be adopted by the Council to enable the affordable requirement to be proportionality calculated, as per the London Plan.</p>	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-068	Hollybrook Homes	Reg18-E-068/069	Homes	H3 Affordable housing	N8.SA 10 Chobham Farm North		2			We welcome reference to the fallback position being through the submission of viability evidence.	Support noted.

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	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	We consider that the affordable housing tenure split may present viability challenges at present LB Newham's Draft Plan is seeking 65% social rent, well in excess of the London Plan requirement for a minimum of 30% social rent, whilst we appreciate social rent may be the most sought after product for the Borough, it is important to offer a good range of affordable housing products to the market to ensure mixed and balanced communities are created through viable schemes.		2.b			H3 Affordable housing	Homes	Reg18-E-068/070	Hollybrook Homes	Reg18-E-068
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	We note the aim for 50% affordable housing. We note Part 2 of the policy which refers to the London Plan's threshold approach. It might be helpful if the policy referred to the percentages required by the London Plan to avoid misinterpretation.		2			H3 Affordable housing	Homes	Reg18-E-106/013	Home Builders Federation	Reg18-E-106

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-105	IQL South	Reg18-E-105/023	Homes	H3 Affordable housing			4			Where Part 4 is applied to amendments to planning permissions, IQL South recommend that flexibility is applied to ensure that any mix secured by a Section 106 agreement is considered as the baseline and new policy requirements are assessed against the uplift. This will be important as there will be many instances where developments will be phased and partially delivered and or occupied when amendments are proposed and compliance to new policy standards or tenure mixes will not be possible.	This policy approach has now changed to clarify that this clause relates only to extensions to existing developments, rather than applications to vary a permission. The latter will be assessed in accordance with the requirements of Local Plan affordable housing policies. Please see the new wording in Policy H3.
Reg18-E-096	L&Q	Reg18-E-096/012	Homes	H3 Affordable housing						We also welcome support for Registered Providers (RPs) to deliver affordable homes.	Support noted.
Reg18-E-096	L&Q	Reg18-E-096/014	Homes	H3 Affordable housing			1		H3.1	As a RP, L&Q will seek to maximise the level of affordable housing viable on a site. However, for clarification RP's are not subject to specific threshold approaches like developments on public sector land and industrial sites are. As such, the wording in Policy H3.1 (Implementation) in the draft Local Plan should reflect this.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				2.b			H3 Affordable housing	Homes	Reg18-D-001/072	Local Plan Drop-In	Reg18-D-001
	Will new housing really be affordable or will it be bought by rich people from other countries and rented out at high rents										
	The Local Plan addresses the issue of meeting housing need through our housing policies, including requirements to deliver more family-sized and affordable homes. However, it cannot deliver influence who the end purchaser of a development is. It should also be noted that research commissioned by the Greater London Authority shows that the impact of foreign investors is mainly felt in zones 1 and 2, where demand is higher, and that the local authorities where new development has been concentrated are not in the main where overseas buyers are most active (https://www.lse.ac.uk/business/consulting/assets/documents/the-role-of-overseas-investors-in-the-london-new-build-residential-market.pdf). This research suggests these buying patterns may not affect Newham to as greater extent as other more centrally located boroughs.										
	Social housing - how much does Newham's specific ability to buy housing - how much does it affect house prices and hotel prices?						H3 Affordable housing	Homes	Reg18-D-001/125	Local Plan Drop-In	Reg18-D-001
	Comment noted. While delivery may have a marginal effect on hotel prices, the delivery of affordable housing secures affordable homes in perpetuity, meaning they will remain at affordable prices or rents in the long term.										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/159	Homes	H3 Affordable housing			2			Difficulty in accessing social rent housing despite having health priority	<p>The Local Plan addresses this topic through housing policies, particularly those relevant to affordable housing and the delivery of family housing. However, it cannot deliver the change you have requested, as our housing waiting list is managed by the Council's Housing team. We have provided them with your comments.</p> <p>The threshold for qualification for urgent medical need is high, in order to ensure that the limited supply of social housing go to those in the most need. This means that not all applicants with a health condition will qualify as having an urgent medical need. Similarly, those who do have an urgent medical need may find it still takes some time bidding to be successful.</p>
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/013c	Homes	H3 Affordable housing			1			It is important that the housing growth in the plan period addresses housing inequalities, affordability, and homelessness.	Comment noted. These issues are addressed through various requirements set out within the Homes chapter, in particular through policies H2 (Protecting and improving existing housing), H3 (Affordable housing) and H6 (Supported and specialist housing).
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/014	Homes	H3 Affordable housing						It is also worth highlighting the LLDC portfolio approach across its remaining delivery sites that commits to delivery of 50% affordable housing at a quantum and mix that has been agreed with the GLA	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the wording of the policy retains flexibility on which intermediate products will be supported. This should be assessed on a case-by-case basis, dependent on the nature of a scheme and viability circumstances.	H2.2		2			H3 Affordable housing	Homes	Reg18-E-052/106	London Legacy Development Corporation	Reg18-E-052
	This policy approach has now changed to incorporate an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.			2			H3 Affordable housing	Homes	Reg18-E-052/107	London Legacy Development Corporation	Reg18-E-052
	This policy approach has now changed to incorporate an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4. Applications with existing legal agreements will continue to apply following the transfer of planning powers from the London Legacy Development Corporation to Newham Council.			2			H3 Affordable housing	Homes	Reg18-E-052/108	London Legacy Development Corporation	Reg18-E-052

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-073	Notting Hill Genesis	Reg18-E-073/007a	Homes	H3 Affordable housing			2.b			<p>Affordable Housing</p> <p>NHG strongly support the overall principles of draft Local Plan Policy H3 (affordable Housing) which is consistent with London Plan Policy H5 (Threshold approach to applications). ... Affordable Housing NHG strongly support the overall principles of draft Local Plan Policy H3 (affordable Housing) which is consistent with London Plan Policy H5 (Threshold approach to applications).</p>	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-073	Notting Hill Genesis	Reg18-E-073/007b	Homes	H3 Affordable housing			3			<p>NHG further support the flexibility provided at Policy H3 (3) which ensures sufficient flexibility where on site provision is inappropriate or undeliverable. ... NHG further support the flexibility provided at Policy H3 (3) which ensures sufficient flexibility where on site provision is inappropriate or undeliverable.</p>	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to clarify that this clause relates only to extensions to existing developments, rather than applications to vary a permission. The latter will be assessed in accordance with the requirements of Local Plan affordable housing policies. Please see the new wording in Policy H3.	However, Policy H3 (4) requires the following: “New residential developments which seek to provide additional housing units either through an amendment to a current permission or an application to extend an existing development on the same or an adjoining site (where the extension is reliant on the existing permission or development to function or to meet policy requirements or standards required elsewhere in the plan), will be assessed against the requirements of Policy H3 based on the combined number of units of both the existing site or permission and the proposed new units.” NHG is generally supportive of the overall intent of the above policy, however it is considered unclear as to how this would work in practice with both existing and / or completed developments. It is initially considered likely to further constrain sustainable brownfield development in the Borough and would therefore not be effective in the delivery of new homes. Further clarity should thus be provided within the supporting text.		4			H3 Affordable housing	Homes	Reg18-E-073/008	Notting Hill Genesis	Reg18-E-073

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 also sets maximum mix targets relevant to the provision of one bedroom and studio units. The text in H3 is intended to provide clarity on the need for different sized homes in different tenures. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes. Delivering a higher proportion of three bedroom homes will help to ensure a better mix of housing is delivered in Newham, that takes into consideration existing stock of housing and demographic data. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>We acknowledge that supporting text H3.2 sets out the following: "In addition to the overall tenure mix split, a development's proposed bedroom size mix of social rent units should be informed by evidence of local housing need as published in Newham's most up-to-date Strategic Housing Market Assessment." LBN's SHMA 2022 demonstrates a local housing need of 50%+ for 3-bedroom units. We are initially concerned that this approach would create an imbalance in new communities. As such, we strongly advocate for a maximum (no more than) percentage to be provided, which will ensure a clear and achievable approach.</p>		2			H3 Affordable housing	Homes	Reg18-E-073/009	Notting Hill Genesis	Reg18-E-073

Reg18 -E-073	Notting Hill Genesis	Reg18- E- 073/026	Homes	H3 Affordabl e housing			1.b		<p>[Appendix D] H3 Affordable Housing Page 172 Proposed Suggested Amendments:</p> <p>1. Newham's strategic target is for 50 per cent of all new homes delivered across the Plan period to be affordable housing. This will be achieved through:</p> <ul style="list-style-type: none"> a. the significant areas of Council and Greater London Authority land ownership within the borough where affordable housing will be prioritised; and b. delivering affordable housing through the threshold approach set out in London Plan (2021) <u>Policy H5 (Threshold approach to applications)</u>; and c. delivering Newham's estate regeneration and affordable homes programmes; and d. supporting Registered Providers to deliver affordable homes. <p>2. New residential developments on individual sites with the capacity for ten units or more should provide:</p> <ul style="list-style-type: none"> a. the percentage of affordable housing required through the threshold approach as set out within Policy H5 of the London Plan (2021); and b. an affordable housing tenure mix of 65 per cent social rent housing and 35 per cent intermediate homes. Developments that do not meet these requirements and the delivery of the required level of family housing under Policy H4.2 cannot follow the fast track route. <p>Reason / Comment NHG strongly support the overall principles of draft Local Plan Policy H3 (affordable Housing) which is consistent with London Plan Policy H5 (Threshold approach to applications). [...]Given the importance of London Plan (2021) Policy H5, we suggest naming the specific policy.</p>	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p>
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	<p>[Appendix D]Proposed Suggested Amendments: 3. New residential developments with the capacity for ten units or more should <u>aim to</u> provide affordable housing on site. Where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions, the scale of the site or local context (including tenure mix), Newham may accept off site provision of affordable housing or exceptionally a payment in lieu of affordable housing provided that it would result in the ability to secure a higherlevel of affordable housing provision than the 50 per cent strategic target sought by part 1 above.</p> <p>Reason / Comment NHG further support the flexibility provided at Policy H3 (3) which ensures sufficient flexibility where on site provision is inappropriate or undeliverable.</p>		3			H3 Affordabl e housing	Homes	Reg18- E- 073/027	Notting Hill Genesis	Reg18 -E-073

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to clarify that this clause relates only to extensions to existing developments, rather than applications to vary a permission. The latter will be assessed in accordance with the requirements of Local Plan affordable housing policies. Please see the new wording in Policy H3.</p>	<p>[Appendix D]Proposed Suggested Amendments: 4. New residential developments which seek to provide additional housing units either through an amendment to a current permission or an application to extend an existing development on the same or an adjoining site (where the extension is reliant on the existing permission or development to function or to meet policy requirements or standards required elsewhere in the plan), will be assessed against the requirements of Policy H3 based on the combined number of units of both the existing site or permission and the proposed new units.</p> <p>Reason / Comment NHG is generally supportive of the overall intent of the policy H3 (4), however it is considered unclear as to how this would work in practice with both existing and / or completed developments. It is initially considered likely to further constrain sustainable brownfield development in the Borough and would therefore not be effective in the delivery of new homes. Further clarity should thus be provided within the supporting text.</p>		4			H3 Affordable housing	Homes	Reg18-E-073/028	Notting Hill Genesis	Reg18-E-073

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 also sets maximum mix targets relevant to the provision of one bedroom and studio units. The text in H3 is intended to provide clarity on the need for different sized homes in different tenures. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes. Delivering a higher proportion of three bedroom homes will help to ensure a better mix of housing is delivered in Newham, that takes into consideration existing stock of housing and demographic data. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>H3.2</p> <p>[Appendix D]</p> <p>LBN's SHMA 2022 demonstrates a local housing need of 50%+ for 3-bedroom units. We are initially concerned that this approach would create an imbalance in new communities. As such, we strongly advocate for a maximum (no more than) percentage to be provided, which will ensure a clear and achievable approach.</p> <p>Proposed Suggested Amendments: supporting text H3.2: "In addition to the overall tenure mix split, a development's proposed bedroom size mix of social rent units should be informed by evidence of local housing need as published in Newham's most up-to-date Strategic Housing Market Assessment."</p> <p>Reason / Comment LBN's SHMA 2022 demonstrates a local housing need of 50%+ for 3-bedroom units. We are initially concerned that this approach would create an imbalance in new communities. As such, we strongly advocate for a maximum (no more than) percentage to be provided, which will ensure a clear and achievable approach.</p>		2			H3 Affordable housing	Homes	Reg18-E-073/029	Notting Hill Genesis	Reg18-E-073

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/037	Homes	H3 Affordable housing			2.a			Draft Policy H3: Affordable Housing Our client is fully committed to the delivery of policy compliant development, to include on-site affordable housing in accordance with the threshold approach set out in London Plan Policy H5.	Comment noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/038	Homes	H3 Affordable housing			2			However, it is important that the policy itself is future-proofed to ensure that it allows for economic and circumstantial changes. This is particularly important when considered alongside the longevity of the build-out of larger allocations and the extent of their associated infrastructure requirements, which need to be balanced as part of the overall scheme deliverability.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3. Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment, as per the requirements of H3.2.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment, as per the requirements of H3.2.</p>	<p>Similarly, the main aim of affordable tenure mix policies is to ensure a diversified range of new affordable housing homes which respond to specific needs and demands within a local area and across the Borough. A set tenure split within the policy is therefore considered too arbitrary and could quickly become superseded by more up to date evidence and market signals as well as affect the overall deliverability of the scheme.</p>		2.b			H3 Affordable housing	Homes	Reg18-E-078/039	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment, as per the requirements of H3.2.</p>	<p>Therefore, as per the reasons set out above, it is important that the policy is appropriately caveated to account for viability considerations which may require a deviation from the thresholds set out where justified and as to not undermine the deliverability of allocations across the borough.</p> <p>Recommendations To ensure a positively prepared and effective Local Plan, in accordance with NPPF 35, we would recommend the following amendments to draft policy wording:</p> <p>· Policy H3 (Part 2. a.) – “the percentage of affordable housing required through the threshold approach as set out within Policy H5 of the London Plan (2021), unless it cannot be achieved due to viability reasons or where it would prejudice the ability to secure other infrastructure / policy priorities and is supported by a financial viability assessment which demonstrates this;”.</p>		2.a			H3 Affordable housing	Homes	Reg18-E-078/040	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3. Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment, as per the requirements of H3.2.	[Recommendations To ensure a positively prepared and effective Local Plan, in accordance with NPPF 35, we would recommend the following amendments to draft policy wording:] · Policy H3 (part 2. b.) – “a target affordable housing tenure mix of 65 per cent social rent housing and 35 per cent intermediate homes, unless taking into account the Council’s most up to date evidence on housing need, a deviation from this can be justified on a site specific basis, reflective of identified affordable housing needs and demands within a local area (and the borough) as well as scheme deliverability ”.		2.b			H3 Affordable housing	Homes	Reg18-E-078/041	Redefine Hotels Portfolio IV Ltd	Reg18-E-078
	Comment noted. This comment appears to reference the Affordable Homes for Newham programme. A number of these sites are considered in the Local Plan housing trajectory, which has informed the Local Plan housing target. The Council is acutely aware of the shortage of genuinely affordable housing in the Borough, and boosting the supply of social-rented homes is a top priority for the Council. Beyond the Local Plan affordable housing target, the Council is delivering new social-rented homes through building, acquiring and supporting the delivery of new homes. Over 1,000 social-rented homes were started between 2018 and 2022, and the new target is to build, acquire or support the	I know that there is a big focus on building new homes. I understand there will be 1,500 affordable homes at social rents in the pipelines.		1.c			H3 Affordable housing	Homes	Reg18-E-002/012	Resident	Reg18-E-002

Comment Response		delivery of 1,500 new social-rented homes by 2026. The economic environment currently makes it extremely challenging to deliver new social-rented homes at scale, but we are committed to using all the tools at our disposal to ensure we meet this commitment.
Comment		
Implementation		
Justification		
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Introduction		
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Representor		
Representation Reference		

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3. Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p> <p>Regarding the provision of homes for people currently living outside the borough, Newham has a significant strategic role to play in delivering new homes to meet both the borough's and London's wider need for housing. Therefore, a proportion of the homes we will deliver will be occupied by residents not currently living in Newham. Our housing and affordable housing targets seek to deliver homes to meet both Newham's and a proportion of London's wider housing need. Furthermore, all social rent homes delivered in the borough will be allocated to people on Newham's housing waiting list.</p>			1			H3 Affordabl e housing	Homes	Reg18-E-002/013	Resident	Reg18-E-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>there are so many council properties that are vacant that are used as food banks if renovated and rented the council would benefit and help in the rising housing crisis but building affordable priorities I have seen that with community neighbourhood properties you will never own it</p> <p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Delivering 10% affordable home ownership homes will help people to buy their own homes. Please see the new wording in Policy H3.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as repairs and improvement works often don't require planning permission. Where repairs and improvement works or conversions require planning permission, proposals will be expected to meet the relevant policy requirements of the Local Plan, including policy H11 requirements around housing design quality.</p>			1			H3 Affordable housing	Homes	Reg18-E-025/001	Resident	Reg18-E-025

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	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Delivering 10% affordable home ownership homes will help people to buy their own homes. Please see the new wording in Policy H3.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as repairs and improvement works often don't require planning permission. Where repairs and improvement works or conversions require planning permission, proposals will be expected to meet the relevant policy requirements of the Local Plan, including policy H11 requirements around housing design quality.</p>			1			H3 Affordabl e housing	Homes	Reg18-E-025/002	Resident	Reg18-E-025

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p>	<p>The Labour Party Manifestos for both 2018 and 2022 both stated that Newham should specify a 50% social housing target. The evidence base set out with the Draft Plan (DP) also sets out very clearly why a target of 50% social housing on all sites in Newham is necessary. The DP entirely fails to contain the specific policies necessary to deliver these manifesto commitments</p> <p>From discussion with the Team Leader of the Planning Policy Team at the East Ham Library Drop In session on Saturday 04 February 2023 and examination of the viability assessment accompanying the DP it is clear that officers have made no attempt to deliver on this manifesto commitment</p>		2.b			H3 Affordable housing	Homes	Reg18-E-098/005	Resident	Reg18-E-098

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/007	Homes	H3 Affordable housing			2.b		Newham Local Plan Viability Assessment, BNP Paribas (2022)	moreover in commissioning the viability study for the DP from consultants (BNP Paribas) who are part of the mainstream of viability assessments, and who will therefore will look at the creation of residual land values in the conventional orthodox way, officers have created a self-fulfilling prophecy that 50% social housing is not affordable.	Comment noted. As per the Greater London Authority's recently published draft Viability LPG, Local Planning Authorities should ensure that viability consultants are properly qualified, experienced and resourced; and have capacity to undertake a thorough Development Viability assessment. There are a limited range of suppliers with significant expertise to undertake reviews of viability assessments which have to be carried out in accordance with RICS guidelines. Due to the specialist nature of this work, Newham, and other local authorities, have struggled to recruit and retain in-house viability expertise. Newham has appointed BNP Paribas as a dedicated viability consultant for the Council. The majority of BNP Paribas work is for other local authorities and most London boroughs use them to provide reviews. The Council and BNP Paribas ensure no conflict of interest issues arise when reviewing different proposals' viability assessments. Moreover, the manifesto commitment was "employ our own viability assessor to forensically scrutinise developer proposals." The employment of BNPP fulfils this commitment.
Reg18-E-098	Resident	Reg18-E-098/008	Homes	H3 Affordable housing			2.b			It is now very clear that "obstruction", of the policy on which the Majority Party was elected, has prevented the 50% social housing target appearing in the DP and this must end if necessary via the political decision making process.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.										
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	There is also a general lack of ambition in the DP re affordable housing provision.		1			H3 Affordable housing	Homes	Reg18-E-098/009	Resident	Reg18-E-098
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	The 2018 Local Plan set out “the need to ensure that 50% of the number of all new homes built over the plan period are affordable units”; however it is clear in early 2023 that is not being met.		1			H3 Affordable housing	Homes	Reg18-E-098/010	Resident	Reg18-E-098

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/011	Homes	H3 Affordable housing			2.b			The new Local Plan must also be clearer on the need to ensure this level of social rented homes throughout the DP period.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-098	Resident	Reg18-E-098/012	Homes	H3 Affordable housing			1			When considering schemes due regard must be made throughout to the proportion of social and affordable housing approved <i>thus far</i> in the 2018 DP period.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-098	Resident	Reg18-E-098/013	Homes	H3 Affordable housing			1		Newham Strategic Housing Market Assessment, Opinion Research Services (2022)	The very high level of Housing Need in Newham is very clear from the Housing List/TA numbers/Evidence Base.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/014	Homes	H3 Affordable housing			2.b			Equally the evidence on poverty and household incomes in Newham is also clear; most “Affordable” Housing is, therefore, not “Affordable” to most Newham households in housing need; thus the need to concentrate on Social Rented homes rather than the flummery of a mixed tariff of sub market housing.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-098	Resident	Reg18-E-098/015	Homes	H3 Affordable housing			1		Newham Local Plan Viability Assessment, BNP Paribas (2022)	New external advice on viability should be urgently sought from advisers not linked to anyone who advises developers and the dedicated internal adviser on viability specified in the 2022 manifesto should also be appointed asap--ie a new mindset and approach are required.	Comment noted. As per the Greater London Authority’s recently published draft Viability LPG, Local Planning Authorities should ensure that viability consultants are properly qualified, experienced and resourced; and have capacity to undertake a thorough Development Viability assessment. There are a limited range of suppliers with significant expertise to undertake reviews of viability assessments which have to be carried out in accordance with RICS guidelines. Due to the specialist nature of this work, Newham, and other local authorities, have struggled to recruit and retain in-house viability expertise. Newham has appointed BNP Paribas as a dedicated viability consultant for the Council. The majority of BNP Paribas work is for other local authorities and most London boroughs use them to provide reviews. The Council and BNP Paribas ensure no conflict of interest issues arise when reviewing different proposals’ viability assessments. Moreover, the manifesto commitment was “employ our own

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	viability assessor to forensically scrutinise developer proposals.” The employment of BNPP fulfils this commitment.										
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	Policy in the DP must re-emphasise the need for more <i>genuinely</i> affordable social housing than has been achieved since local authorities opted out of social housing provision in the Thatcher years.		2.b			H3 Affordable housing	Homes	Reg18-E-098/021	Resident	Reg18-E-098

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/022	Homes	H3 Affordable housing			2.b			<p>Developers must be put on notice through this DP re-write that Newham will emphatically scrutinise all purported shortfalls in social housing suggested through developer viability assessments. This must be done at an early stage, and no early presentation to planning committee members or local ward councillors should be permitted where prospective developers suggest they are at that point unable to give clear indications of 50% social housing on site whilst at the same time displaying endless PowerPoint slides of promotional puff.</p>	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. All viability assessments will be robustly scrutinised and review mechanisms put in place, as per requirements set out on BFN4.</p>
Reg18-E-098	Resident	Reg18-E-098/043	Homes	H3 Affordable housing						<p>RSLs/RPs should be treated as developers.</p>	<p>A change to this section has not been made. We did not consider this change to be necessary as Registered Social Landlord will be required to meet relevant requirements of the Local Plan in the same way that a private developer would. Planning permissions are applicable to specific areas of land rather than individual applicants, so it is important planning policies are applied consistently, regardless of who a developer is.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-104	Resident	Reg18-E-104/002	Homes	H3 Affordable housing			1			It remains important to note that while the 2018 Local Plan set out “the need to ensure that 50% of the number of all new homes built over the plan period are affordable units”, it is clear at this stage in the plan period that we are falling far short of that ambition. The new Local Plan must be clearer on the need to reach that ambition throughout the plan period	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-104	Resident	Reg18-E-104/004	Homes	H3 Affordable housing			1			When considering schemes due regard must be made throughout to the proportion of affordable housing approved thus far in the plan period. Many schemes will now require affordable housing of much more than 50% of homes in many forthcoming developments to achieve a net approval of 50% over the plan period	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-104	Resident	Reg18-E-104/010	Homes	H3 Affordable housing			1			I recognise the local planning authority [sadly] cannot completely disregard national planning policies in relation to affordable housing thresholds being ‘subject to viability’. This language is sadly inaccessible to many of the general public, but nevertheless frustrates the local planning authority’s affordable housing targets.	Comment noted. This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	and multiple affordability challenges our residents face. Please see the new wording in Policy H3.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as any shortfall against affordable housing targets will require the submission of a viability assessment, which will be robustly reviewed by the Council's appointed viability consultants.	Developers must be put on notice through this new Local Plan re-write that Newham will emphatically scrutinise all purported shortfalls in affordable housing suggested through developer viability assessments.		2			H3 Affordable housing	Homes	Reg18-E-104/011	Resident	Reg18-E-104
	Comment noted. As per the Greater London Authority's recently published draft Viability LPG, Local Planning Authorities should ensure that viability consultants are properly qualified, experienced and resourced; and have capacity to undertake a thorough Development Viability assessment. There are a limited range of suppliers with significant expertise to undertake reviews of viability assessments which have to be carried out in accordance with RICS guidelines. Due to the specialist nature of this work, Newham, and other local authorities, have struggled to recruit and retain in-house viability expertise. Newham has appointed BNP Paribas as a dedicated viability consultant for the Council. The majority of BNP Paribas work is for other local authorities and most London boroughs use them to provide reviews. The	The Local Planning Authority should recruit in-house viability expertise.		2			H3 Affordable housing	Homes	Reg18-E-104/012	Resident	Reg18-E-104

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Council and BNP Paribas ensure no conflict of interest issues arise when reviewing different proposals' viability assessments. Moreover, the manifesto commitment was "employ our own viability assessor to forensically scrutinise developer proposals." The employment of BNPP fulfils this commitment.										
	So many properties in Newham are poor quality - it took us a long time to find a reasonably priced house that hadn't been ruined by landlords. We want to make this our home.				3.132		H3 Affordabl e housing	Homes	Reg18-K-003/012	Resident	Reg18-K-003

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-037	Resident	Reg18-K-037/006a	Homes	H3 Affordable housing			1	3.137		More needs to done to provide good quality affordable rental accommodation for all. First time renters, as well as first time buyers [Originally submitted on Para 3.137 of H1]	A change to this policy approach has not been made. We did not consider this change to be necessary as requirements in policies in H5, H9 and H11 should help address these concerns. These policies seek to improve the quality and affordability of rented accommodation. These concerns will also be partly addressed through the borough's landlord licencing scheme, which requires rented properties in the borough to meet required quality standards.
Reg18-K-047	Resident	Reg18-K-047/008	Homes	H3 Affordable housing			2.b			Truly affordable homes are needed in Newham - there needs to be actual council homes built!	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-T-011	Resident	Reg18-T-011/003	Homes	H3 Affordable housing						[Keep it]	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	residents face. Please see the new wording in Policy H3.										
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	[Please share any feedback you have with us.] Any housing that is built should be made affordable.		1			H3 Affordabl e housing	Homes	Reg18-T-015/003	Resident	Reg18-T-015

Reg18-T-018	Resident	Reg18-T-018/012	Homes	H3 Affordable housing			1			<p>[Add to it] More properties shorter waiting lists for the people who are on the home priority list</p> <p>The Local Plan addresses this topic through housing policies, particularly those relevant to affordable housing and the delivery of family housing. However, it cannot deliver the change you have requested, as our housing waiting list is managed by the Council's Housing team. We have provided them with your comments.</p> <p>The Council is acutely aware of the shortage of genuinely affordable housing in the Borough, and boosting the supply of social-rented homes is a top priority for the Council. The Council is delivering new social-rented homes through building, acquiring and supporting the delivery of new homes. Over 1,000 social-rented homes were started between 2018 and 2022, and the new target is to build, acquire or support the delivery of 1,500 new social-rented homes by 2026. The economic environment currently makes it extremely challenging to deliver new social-rented homes at scale, but we are committed to using all the tools at our disposal to ensure we meet this commitment.</p> <p>The 37,000 households currently on the housing register is a reflection of the huge scale of housing need in Newham. Between 600 and 800 social-rented properties are let per year, which means that many of those households will never be allocated a council or social-rented property.</p> <p>The way in which social housing is allocated to individual households is set out in the Council's Allocations Policy. This sets out how households bidding for each property are prioritised by the acuteness of a household's housing need rather than simply how long a household has been waiting. This means that even households who have waited over ten or even twenty years may not be successful in bidding if there are households with a higher need. For this reason</p>
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											we encourage households to consider other options besides social-rented housing in Newham, such as looking for social or privately-rented housing in cheaper areas outside London if appropriate.
Reg18-T-019	Resident	Reg18-T-019/011	Homes	H3 Affordable housing						[Add to it] Need to do more	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/006		H3 Affordable housing			2			[Please provide any comments and feedback on the *Introduction*.] Housing [and commercial developments] should include provision for genuinely affordable rents and social housing.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-T-034	Resident	Reg18-T-034/030	Homes	H3 Affordable housing						[Add to it] New developments and redevelopments should ensure a range of housing available for people with larger families, 2, 3, 4 bedroom properties not just studios and 1 beds.	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	justify this through the submission of a viability assessment.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan includes requirements for the provision of private amenity space for new homes under policy H11. Other policies in the plan related to Green and Water Spaces and Neighbourhoods also seek to address these concerns by helping to protect and improve residents' access to open spaces.	[Add to it] People need gardens and access to outside space.					H3 Affordable housing	Homes	Reg18-T-034/031	Resident	Reg18-T-034

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/032	Homes	H3 Affordable housing						[Add to it] New built and existing properties should be expected to have provision for rubbish and waste off the street so it doesn't impact others.	A change to this policy approach has not been made. We did not consider this change to be necessary as policy W3 (Waste management in developments) requires major residential developments to submit a Waste Management Plan that accords with the requirements of Newham's most up-to-date Waste Management development guidelines. These guidelines require new developments to provide off-street waste management.
Reg18-T-057	Resident	Reg18-T-057/029	Homes	H3 Affordable housing						[Add to it] J	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-058	Resident	Reg18-T-058/033	Homes	H3 Affordable housing						[Add to it] Council should take properties and sell it to an affordable people in good schemes in a monthly instalment plan.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council has an acquisitions programme that purchases homes and makes them available to households experiencing homelessness at sub-market rent levels (Local Housing Allowance rates). There are also affordable housing products that seek to meet the needs of residents aspiring to home ownership, including Shared Ownership and London Living Rent.
Reg18-T-082	Resident	Reg18-T-082/010	Homes	H3 Affordable housing			2			[Add to it] Rents should be cheaper there should support tp buy or rent houses so it's accessible	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	our residents face. Please see the new wording in Policy H3.										
	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	[Keep it] Keep it affordable		1			H3 Affordabl e housing	Homes	Reg18-T-086/005	Resident	Reg18-T-086

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							H3 Affordable housing	Homes	Reg18-T-086/006	Resident	Reg18-T-086
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>The Renters Reform Bill 2023 also proposes outlawing 'blanket bans' on families with children or people receiving benefits. This is currently in its second reading in the House of Commons.</p>										
							H3 Affordable housing	Homes	Reg18-T-088/012	Resident	Reg18-T-088
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p>										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan's policies requiring the delivery of affordable and family-sized homes, including 5% four bedroom homes on site allocations, will help to address issues of overcrowding in the borough.</p> <p>In the shorter term, we have commissioned some research into how the Council could mitigate some of the negative health and wellbeing impacts of overcrowding. This aims to improve the experience of living in an overcrowded household, especially for families with children. The research will report its findings in early 2024.</p>									Resident	Reg18-T-088
	<p>The Local Plan addresses this topic through housing policies, particularly those relevant to affordable housing and the delivery of family housing. Policy H11 of the draft Local Plan seeks to deliver better designed and fully wheelchair adapted social rent dwellings to help meet these needs.</p> <p>Where possible, the Council will support adaptations to existing homes in order to mitigate these issues. There are a number of options depending on the type of property and whether the household is a private tenant, owner-occupier or Council tenant, and more information can be found on the Council's website (https://www.newham.gov.uk/homeadaptations).</p>			3			H3 Affordable housing	Homes	Reg18-T-088/029	Resident	Reg18-T-088

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-090	Resident	Reg18-T-090/001	Homes	H3 Affordable housing			1			[Change it] I am concerned that only 50% of housing will be 'affordable'	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-T-090	Resident	Reg18-T-090/002	Homes	H3 Affordable housing			2.b			[Change it] I am concerned that [only 50% of housing will be 'affordable'] and that only 65% of that will be social rent.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-T-090	Resident	Reg18-T-090/003	Homes	H3 Affordable housing			1			[Change it] In 2020 Newham was ranked third lowest for average employee income https://www.mylondon.news/news/zone-1-news/londons-richest-boroughs-average-income-18114728 . A significantly higher proportion should be 'affordable'	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges

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	our residents face. Please see the new wording in Policy H3.										
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	[Change it] In 2020 Newham was ranked third lowest for average employee income https://www.mylondon.news/news/zone-1-news/londons-richest-boroughs-average-income-18114728 . [A significantly higher proportion should be 'affordable'] and within that a higher proportion should be social rent.		2.b			H3 Affordabl e housing	Homes	Reg18-T-090/004	Resident	Reg18-T-090

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Newham's the Strategic Housing Market Assessment (Newham's evidence of housing needs) has calculated housing need across the borough based on the assumption that 35% of income provides a reasonable basis for calculating what households should reasonably expect to pay for their housing cost. The study then used this assumption to identify the number of households requiring different types of affordable accommodation, dependent on their income levels. This has informed both our affordable housing and family housing targets in the draft Local Plan.</p>			2.b			H3 Affordable housing	Homes	Reg18-T-090/005	Resident	Reg18-T-090

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-102	Resident	Reg18-T-102/004	Homes	H3 Affordable housing						[Keep it]	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-T-103	Resident	Reg18-T-103/021	Homes	H3 Affordable housing			1			[Change it] The housing is not affordable	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-T-105	Resident	Reg18-T-105/014	Homes	H3 Affordable housing						[Keep it]	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.										
	[Add to it] We need more affordable housing as commercial rent is a disgrace			1			H3 Affordable housing	Homes	Reg18-T-108/007	Resident	Reg18-T-108
	[Add to it]						H3 Affordable housing	Homes	Reg18-T-126/011	Resident	Reg18-T-126
	The Local Plan addresses the topic of homelessness through housing policies. However, it cannot deliver the change you have requested. Our colleagues in the Homelessness Advise and Prevention Service can be contacted regarding homelessness, by emailing HPAS@newham.gov.uk. Please note our Homelessness Prevention and Advice team do not operate from our Housing Hubs. For further information regarding Housing Hubs, please see						H3 Affordable housing	Homes	Reg18-S-001/002	Shelter	Reg18-S-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	the following weblink: https://www.newham.gov.uk/housing-homes-homelessness/housing-hubs .										
	The Local Plan addresses the topic of homelessness through housing policies. However, it cannot deliver the change you have requested. Our colleagues in the Homelessness Advise and Prevention Service can be contacted regarding homelessness, by emailing HPAS@newham.gov.uk. Please note our Homelessness Prevention and Advice team do not operate from our Housing Hubs. For further information regarding Housing Hubs, please see the following weblink: https://www.newham.gov.uk/housing-homes-homelessness/housing-hubs .	Do Housing Hubs have an offer for people with English as a second language?					H3 Affordabl e housing	Homes	Reg18-S-001/004	Shelter	Reg18-S-001
	This policy approach has now changed to incorporate a new policy clause that requires development referable to the Mayor of London to design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study'. This study will consider the design needs of neurodivergent residents, residents with learning disabilities and residents on Newham's housing waiting list. It will also seek to undertake engagement with residents whose access to	Suggestion to speak to the West Ham GP surgery parents forum					H3 Affordabl e housing	Homes	Reg18-S-001/009	Shelter	Reg18-S-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	housing is affected by these design needs. Please see the new wording in Policy H11.										
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	Need to ensure the homes we are delivering are genuinely affordable.		2.b			H3 Affordable housing	Homes	Reg18-S-001/013	Shelter	Reg18-S-001
	<p>The Local Plan addresses this topic through housing policies. However, it cannot deliver the change you have requested. We have provided our colleagues in the housing department with your comments.</p> <p>The Council doesn't manage or regulate the performance of Housing Associations. However, we can liaise with Housing Associations to respond to particular issues when these are raised, or direct residents to the Housing Ombudsman. We would urge residents to first</p>	Issues with poor quality RSLs.					H3 Affordable housing	Homes	Reg18-S-001/014	Shelter	Reg18-S-001

Comment Response	
	raise issues with their social landlord, then seek advice from the Housing Ombudsman's website.
Comment	
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	

Reg18 -E-069	Silvertown Homes Ltd	Reg18- E- 069/025	Homes	H3 Affordabl e housing			2		<p>The SHMA assesses that of the total need for 55,872 homes, 25,136 (45% of the total) will need to be affordable. The overall mix, by bedroom number, that the SHMA arrives at is as set out below in Table 2, this is set alongside the equivalent Thameside West mix.</p> <p>Thameside West will deliver a mix of affordable and market dwellings to meet identified needs and contributes towards meeting the Newham wide, plan period mix assessed by the SHMA. Whilst the proposed housing mix does not precisely mirror the mix arrived at by the SHMA, it should not be expected to and any policy based on the SHMA findings should recognise this and apply flexibility, with each development assessed on its own merits.</p> <p>Table 2: Housing Tenure and Mix by Bedroom Number [Table showing comparison of Thameside West and SHMA LHN housing need]</p> <p>The SHMA presents alternative housing mix scenarios, that address the London Plan requirement. These include the mix associated with the London Plan housing target for Newham (4,760 dwellings per annum, 80,920 dwellings in total). Whilst this scenario tips the tenure balance further towards affordable housing (a split of about 54% affordable and 46% market housing) the need to apply housing mix policy flexibly would again apply.</p> <p>We note that the draft Local Plan adopts a flexible approach, setting a threshold for at least 35% affordable housing, by habitable room.</p> <p>Recommendation</p> <p>LBN should maintain the flexibility applied in the SHMA. Any housing mix and affordable housing</p>	Comment noted. Where affordable housing or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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										<p>policies contained within the draft Local plan recognise this in their supporting text and apply flexibility, with each development assessed on its own merits.</p>	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as this is addressed via the wording and implementation text in H3 around developments needing to submit a viability assessment where they don't provide sufficient levels of family or affordable housing in line with policy requirements.	<p>H2.2</p> <p>E) Viability Study We note that the viability study produced by BNPRE is typology based and high level. It does not accurately reflect the viability dynamics of individual large / complex multi-phased schemes as they come forward through the planning process and are built out. As indicated in the NPPG (see extract below) it is at the application stage that the circumstances relevant to each site should be considered (not a typology-based assessment).</p> <p>Recommendation SHL suggests that:</p> <ul style="list-style-type: none"> • LBN clarifies in the supporting text relating to affordable housing policy in the draft local plan that if the need for a viability assessment is required to support a planning application, it is the applicants responsibility to demonstrate viability using site-specific evidence at the application stage. 		2			H3 Affordable housing	Homes	Reg18-E-069/037	Silvertown Homes Ltd	Reg18-E-069

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. There is no variation in affordable housing delivery requirements according to land use in the amended policy. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. With regards to surplus utilities sites, exceptional costs associated with decontamination will need to be factored into a development's residual land value (with scenarios provided demonstrating appraisals for the scheme with and without the decontamination cost), as well as taken into consideration in a development's benchmark land value.</p>			2			H3 Affordable housing	Homes	Reg18-E-136/103b	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/106	Homes	H3 Affordable housing			1			The Berkeley Group notes the strategic target in this policy for 50% of all new homes delivered across the Plan period to be affordable housing, which will be achieved through a number of measures including through the threshold approach set out in the London Plan (point 1).	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/107	Homes	H3 Affordable housing			2			Policy H5 of the London Plan sets a lower requirement for 35% affordable housing as the Fast Track threshold. The requirement for 50% affordable housing does not align with the adopted London Plan. This is particularly relevant to gasworks sites, which as noted earlier in these representations, are acknowledged in the London Plan for their strategic role in the delivery of housing but also for the exceptional abnormal costs associated with bringing forward these sites for development. Footnote 59 of the London Plan applies the 35% Fast Track threshold to former utility sites instead of the 50% threshold that would be applied if these sites were treated as industrial sites and not acknowledged for their unique characteristics.	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. There is no variation in affordable housing delivery requirements according to land use in the amended policy. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. With regards to surplus utilities sites, exceptional costs associated with decontamination will need to be factored into a development's residual land value (with</p>

Comment Response	
	scenarios provided demonstrating appraisals for the scheme with and without the decontamination cost), as well as taken into consideration in a development's benchmark land value.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. There is no variation in affordable housing delivery requirements according to land use in the amended policy. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. With regards to surplus utilities sites, exceptional costs associated with decontamination will need to be factored into a development's residual land value (with scenarios provided demonstrating appraisals for the scheme with and without the decontamination cost), as well as taken into consideration in a development's benchmark land value.</p>			2			H3 Affordable housing	Homes	Reg18-E-136/108	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	Point 2 (b) of the policy outlines an affordable housing tenure mix of 65% social rent housing and 35% intermediate homes. This does not align with the London Plan which seeks a minimum of 30% low-cost rented homes, 30% as intermediate and the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products based on identified need (Policy H6). This would equate to a 70 : 30 split. Point 2 (b) should be updated to align with the London Plan for consistency and continuity and on the basis that other draft policies in the Local Plan Refresh have sought to align themselves with the requirements of the London Plan. The Berkeley Group proposed amendments to draft policy wording: 2. New residential developments on individual sites with the capacity for ten units or more should provide: a. the percentage of affordable housing required through the threshold approach as set out within Policy H5 of the London Plan (2021); and b. an affordable housing tenure mix of 65-70 per cent social rent housing and 35 <u>30</u> per cent intermediate homes.		2.b			H3 Affordable housing	Homes	Reg18-E-136/109	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Reg18 -E-136	St William Homes LLP and Berkeley South East London Limited	Reg18- E- 136/362	Homes	H3 Affordabl e housing			2.a			<p>[This Appendix sets out further detail on the physical characteristics of gas holder sites and planning policy which relates to them. Gasholder Planning Policy] The adopted London Plan carries the full weight of the development plan. It is consistent with the Framework. Importantly specific consideration has been applied to Gas sites. The reason for this is that SGN and Berkeley were able to work with the GLA to examine the evidence base behind the challenges of delivering gas Holder sites. The background evidence base, as well as the determination of live planning applications considered by the GLA led to the formation of policies. These policies have been subject to extensive and detailed consultation, review and examination in public. Three principal issues informed the policy debate and led to surplus utility sites being included in the strategic supply of housing in London under Policy H1 and Footnote 59. We consider the policy discussions below and the matters that informed Gas sites being treated as an exception under London Plan Footnote 59. The evidence base to the London Plan recognises that remediation costs of Gas sites are significant. The London Industrial Land Demand Study 2017 explicitly recognises the limitation of land contamination at Gas sites, its cost, and the requirement to incentivise development through higher land values. It confirms the following: "Land contamination can constrain the future of such land (e.g. for former gas holder sites): decontamination Holder are costly and can require the incentive of higher land values (e.g. from residential developments)". The abnormal costs will be experienced at the very start of the project, which can also result in long lead in times as the environmental planning considerations are addressed (remediation, water sampling etc). Decontamination costs were considered at the</p>	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. There are no variations in affordability requirements dependent on land use in the revised wording. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>With regards to surplus utilities sites, exceptional costs associated with decontamination will need to be factored into a development's residual land value (with scenarios provided demonstrating appraisals for the scheme with and without the decontamination cost), as well as taken into consideration in a development's benchmark land value.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>
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										<p>Tower Hamlets Local Plan 2031 Examination in Public (September 2018). The Council's own evidence base to the examination included the Tower Hamlets Local Plan Viability Assessment 2018 Paragraph 7.17. This considered three Gasholder sites within its borough concluding that "we have included an allowance of £3.2m/ha for the sites, based on our experience of the costs associated with decontamination of similar Gas Holder sites in London". In SGN and Berkeley's experience this is a conservative figure as it relates only to decontamination rather than other costs such as the need to relocate and upgrade gas infrastructure on site to facilitate redevelopment; rationalise high pressure gas mains; the erection of new Pressure Reduction Stations; and the removal of gasholder structures and redundant underground pipes. However, it remains a significant cost. Notwithstanding this, Tower Hamlet's own viability evidence found that the three Gas sites could not deliver policy compliant levels of affordable housing (an average maximum reasonable affordable housing provision of 20% was evidenced across the three sites). To ensure deliverability for the purposes of the local plan Tower Hamlets found it necessary to indicate lower levels of affordable housing or ensure policy flexibility through increased density and housing mix to achieve policy compliant levels of affordable housing. The London Plan categorises Gas sites as surplus utility sites, and these sites are identified as a strategic source of housing. Policy H1 Increasing housing supply is the principal housing delivery policy of the London Plan. Its purpose is 'increasing housing supply'. Part B(2) states that Boroughs should "optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the</p>	
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										<p>following sources of capacity...". The policy lists six strategic sources of housing capacity. Sub paragraph (d) is relevant to gas Holder sites and identifies them for redevelopment as a strategic source of housing: "d) the redevelopment of surplus utilities and public sector owned sites." Surplus utilities are distinguished from other categories of sites. For example, industrial sites planned for release under Policies E4, E5, E6 and E7 are a separate sub-category at Policy H1(b)(2)(f). Utility sites are also considered in the Strategic Housing Land Availability Assessment 2017 (SHLAA) which forms part of the evidence base for the new London Plan. The SHLAA confirms that "surplus utilities sites" have been retained within the 10-year housing target where promoted for redevelopment unlike designated industrial sites. To incentivise and de-risk the delivery of Gas sites, the London Plan exempts these sites from the London wide affordable housing requirement for industrial sites. Instead, it recognises that Gas sites will have a lower affordable threshold and exempts them from late-stage reviews where challenges of delivery are evidenced. Footnote 59 of the new London Plan specifically sets out what tests surplus utility sites should undertake to demonstrate the challenges of delivery. Footnote 59 recognises the substantial costs of preparing surplus utilities sites for development. It therefore (inter alia) confirms that surplus utility sites can be subject to the 35% affordable housing fast track approach, conditional upon evidence being provided of extraordinary costs. "It is recognised that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold</p>	
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										<p>could be applied, subject to detailed evidence, including viability evidence, being made available”1. Gas sites are therefore capable of having a 35% threshold level of affordable housing applied and follow the Fastrack Route. The Mayor requires the demonstration of decontamination requirements, and that enabling or remediation costs must be incurred to bring surplus utility sites forward for development. In accordance with the approach taken across London to date, Berkeley will evidence the substantial decontamination, enabling and remediation costs during the pre-application process.</p>	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. There are no variations in affordability requirements dependent on land use in the revised wording. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>With regards to surplus utilities sites, exceptional costs associated with decontamination will need to be factored into a development's residual land value (with scenarios provided demonstrating appraisals for the scheme with and without the decontamination cost), as well as taken into consideration in a development's benchmark land value.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>[This Appendix sets out further detail on the physical characteristics of gas holder sites and planning policy which relates to them. Gasholder Planning Policy] The challenges of delivery of Gas sites has been reflected in the economic policies of the London Plan. Supporting text to Policy E4 (Land for Industry, Logistics and Services to Support London's Economic Function) previously confirmed that the principle of no net loss of industrial floorspace capacity does not apply to sites previously used for utilities infrastructure which are no longer required e.g., surplus utility sites, because of their delivery challenges. "The principle of no net loss of floorspace capacity does not apply to sites used for utilities infrastructure or land for transport functions which are no longer required"2. As a result of the Secretary of State's decision to direct the Mayor to remove Policy E4(C) which sought, in overall terms across London, no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS, the supporting text to this policy has also been deleted (former paragraph 6.46-6.4.11). Paragraph 6.4.8 was also removed due to the blanket approach. The London Plan objective that Gas sites should not provide industrial capacity was however a principle tested through the London plan review and remains an accepted policy principle.</p>		2.a			H3 Affordable housing	Homes	Reg18-E-136/363	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. There are no variations in affordability requirements dependent on land use in the revised wording. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>With regards to surplus utilities sites, exceptional costs associated with decontamination will need to be factored into a development's residual land value (with scenarios provided demonstrating appraisals for the scheme with and without the decontamination cost), as well as taken into consideration in a development's benchmark land value.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2.a			H3 Affordable housing	Homes	Reg18-E-136/364	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				2.b			H3 Affordable housing	Homes	Reg18-As-001/029	Stratford and West Ham Assembly	Reg18-As-001
				2			H3 Affordable housing	Homes	Reg18-As-001/146	Stratford and West Ham Assembly	Reg18-As-001

[Change] Social rent should be higher than 65%

This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.

[Change] Is London affordable rent @ £150pw actually affordable in Newham?

This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.

Furthermore, London Affordable Rent properties are less likely to be delivered in Newham now that the tenure is no longer funded by the Affordable Homes for Londoners programme. Newham's Strategic Housing Market Assessment (SHMA) evidence base set out the total weekly costs of different tenures of housing, and provides analysis of which residents can afford these different tenures. This has then informed

Comment Response	the calculation of Newham's housing need, shown in figures 48 to 51 of the SHMA.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/011	Homes	H3 Affordable housing			4			<p>Stratford East support the policy overall but consider refinements should be made to Part 4 in relation to amendments to consents to allow flexibility to ensure that any position secured by a Section 106 agreement is considered as the baseline and new policy requirements should only apply to uplift in development above the original consent.</p> <p>This will be important as there will be many instances where developments will be phased and partially delivered and or occupied when amendments are proposed and compliance to new policy standards or tenure mixes will not be possible.</p>	This policy approach has now changed to clarify that this clause relates only to extensions to existing developments, rather than applications to vary a permission. The latter will be assessed in accordance with the requirements of Local Plan affordable housing policies. Please see the new wording in Policy H3.
Reg18-T-063	Student	Reg18-T-063/005	Homes	H3 Affordable housing						[Keep it]	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	The proposed alignment of Newham policy – draft Policy H3 (Affordable Housing) to the Affordable Housing Threshold Approach set out in the London Plan is supported and will enable the achievement of general conformity with the London Plan. Evidence from other Boroughs has shown that the incentive offered by the Threshold Approach has resulted in increased delivery of affordable housing and, in particular, family sized social rent units. The hybrid planning application proposals for Silvertown align with this approach and are considered to be Fast Track compliant.		2.a			H3 Affordable housing	Homes	Reg18-E-111/016	The Silvertown Partnership LLP	Reg18-E-111
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3. Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.	The proposed additional 5% requirement for social rent housing needs to be comprehensively considered from a viability and deliverability perspective. The BNPP Study which underpins the draft plan indicates that this change would negatively impact on scheme viability. It could therefore risk reducing the total number of affordable homes that can be delivered over the plan period contrary to the objectives of the plan.		2.b			H3 Affordable housing	Homes	Reg18-E-111/017	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	<p>[Appendix A] The proposed alignment to the Mayor's Fast Track Approach as set out in the London Plan and associated guidance is supported. This aligns with the hybrid planning application which is Fast Track Approach compliant.</p> <p>Evidence from other Boroughs has shown that the incentive offered by the Threshold Approach has resulted in increased delivery of affordable housing and, in particular, family sized social rent units. It would however be beneficial for the policy to specifically state that the calculation of affordable housing proportion should be based on habitable rooms per the London Plan. The habitable room measure reflects London Borough of Newham's (LBN) prioritisation of delivering low cost rent family homes. It is also the most up to date measure bringing the Local Plan into consistency with the London Plan.</p>		2.a			H3 Affordable housing	Homes	Reg18-E-111/074	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2.b			H3 Affordable housing	Homes	Reg18-E-111/075	The Silvertown Partnership LLP	Reg18-E-111
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>Where this target or family housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2.b			H3 Affordable housing	Homes	Reg18-E-111/076	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to exclude sheltered housing, extra-care and care home accommodation from this requirement. However, age-restricted general needs housing will still need to meet these requirements. Please see the new wording in Policy H4.	While there is clearly a need for more family housing in Newham, it would not be appropriate for an older persons' housing development to include the mix of housing required by Policy H4. It is appropriate to assume that specialist housing for older people would comprise a mix of one and two-bedroom homes. To ensure the policy is effective, there should be an exception in Policy H4 for older persons' housing.		2			H4 Housing mix	Homes	Reg18-E-050/018	Anchor	Reg18-E-050
	Comment noted.	d. H4: Housing Mix - Would you keep, change or add something to this policy? <i>All new residential developments should deliver a mix and balance of housing types and sizes. Developments on individual sites capable of delivering ten housing units or more should deliver 40 per cent of the number of new homes as family housing (C3 dwelling houses) with three or more bedrooms.</i> Comment: The NPPF requires local planning authorities to positively seek opportunities to meet the development needs of their area. The NPPF also requires a presumption in favour of sustainable development, which includes the need of local planning authorities to support 'strong, vibrant and healthy communities.		2			H4 Housing mix	Homes	Reg18-E-070/073	Aston Mansfield	Reg18-E-070

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2 to 5			H4 Housing mix	Homes	Reg18-E-122/008	Ballymore	Reg18-E-122

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.</p> <p>The London Plan (2021) requires density to be considered using a range of measures. These measures include the delivery of habitable rooms per hectare, recognising the contribution the delivery of family-sized homes can make to site density.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why opportunity areas and locations with good access to public transport cannot deliver family homes. It is important we deliver family homes in these locations as this is where a significant proportion</p>			2 to 5			H4 Housing mix	Homes	Reg18-E-122/009	Ballymore	Reg18-E-122

Comment Response	Comment	of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as there is no robust evidence to demonstrate why town centres and locations with good access to public transport cannot deliver family homes. It is important we deliver family homes in these locations as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.</p>	<p>[Appendix 1] The restriction on the provision of studio units proposed in Part 5 does not reflect the strong demand in London for studio units, which are an important part of the housing mix and create an accessible means of home ownership in inner London. Whilst studio units might not be appropriate in all areas in the borough, there is a strong demand for studios in high density areas and town centres, such as Stratford Metropolitan Centre.</p>		5			H4 Housing mix	Homes	Reg18-E-122/010	Ballymore	Reg18-E-122

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-122/011	Ballymore	Reg18-E-122

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-122	Ballymore	Reg18-E-122/012	Homes	H4 Housing mix			5			<p>[Appendix 1] We also recommend that Part 5 should be amended to allow flexibility for the provision of studios and could set out where these could be appropriate, such as highly accessible sites, opportunity areas and town centres.</p>	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as there is no robust evidence to demonstrate why town centres and locations with good access to public transport cannot deliver family homes. It is important we deliver family homes in these locations as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.</p>
Reg18-E-077	Ballymore Group	Reg18-E-077/025	Homes	H4 Housing mix			1			<p>Ballymore supports the Council's desire to ensure residential developments deliver a range of housing types and sizes to secure quality, mixed and balanced communities, [...]</p>	<p>Support noted.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-077/026	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	Draft policy H4 seeks to secure 40% of all new homes as family housing (an increase from the current policy position of 39%). As set out above, we have concerns that this will place increased financial pressure on the delivery of schemes and, particularly when balanced with affordable housing delivery, could have significant impacts on the viability and delivery of schemes (particularly large strategic sites). As such, we support the inclusion of viability testing within the draft policy to demonstrate when this isn't achievable.		2			H4 Housing mix	Homes	Reg18-E-077/027	Ballymore Group	Reg18-E-077
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the</p>	<p>In addition, the draft policy seeks to resist the delivery of studios and 1b2p homes are limited to 15% of the total provision. These smaller units often help to improve the viability and deliverability of a scheme, thereby allowing the scheme to support a higher proportion of family housing across the affordable tenure. We would support the Council in resisting these smaller units within the affordable element of a scheme, [...]</p>		4			H4 Housing mix	Homes	Reg18-E-077/028	Ballymore Group	Reg18-E-077

Comment Response	viability of scheme delivery. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>[...] however, contend that studios should be allowed as an element of the overall private housing offer of a scheme to support the viable delivery of sites.</p> <p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			5			H4 Housing mix	Homes	Reg18-E-077/029	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			4 to 5			H4 Housing mix	Homes	Reg18-E-077/030	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>						H4 Housing mix	Homes	Reg18-E-077/031	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>Family housing</p> <p>The adopted Local Plan sets a target mix of 39% of new homes to be family-sized accommodation (3-bed +). This is a higher requirement than many other neighbouring boroughs. Draft Plan Policy H4 seeks to raise this number to 40% for sites capable of delivering 10 units or more. The existing policy is heavily burdensome and risks inhibiting development due to the viability challenges associated with the delivery of larger units.</p>		2			H4 Housing mix	Homes	Reg18-E-121/033	Barratt London	Reg18-E-121

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-121	Barratt London	Reg18-E-121/034	Homes	H4 Housing mix			2			Whilst Barratt London recognise there is a significant need for larger sized family homes, the proposed policy also fails to recognise the role that 1 and 2-bed units can have in addressing this need, particularly as they can help to attract those wanting to downsize and free up existing family housing stock. Given this is acknowledged in the London Plan, we would request this is taken into consideration when assessing any potential change to the target amount of family housing to be provided. Moreover, 2-bed, 4-person units have also been recognised as being able to provide suitable accommodation for families and this more flexible position should be recognised in any change to the housing mix policy.	A change to this policy approach has not been made. We did not consider this change to be appropriate as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.
Reg18-E-121	Barratt London	Reg18-E-121/035	Homes	H4 Housing mix			1			As the greatest need for family sized accommodation is from those who are on LBN's housing waiting list, the new Local Plan could also stipulate a target tenure mix for the family housing sought. To encourage family housing delivery the interplay of family housing and affordable housing should be explicitly considered to recognise that the high delivery of family housing can impact on the overall delivery of affordable housing. Policy should be constructed to recognise these interdependences and give credit with respect to family housing where high delivery of affordable is achieved, and vice versa.	A change to this policy approach has not been made. We did not consider this change to be appropriate as the borough's Strategic Housing Market Assessment shows a need for a range of sizes of social rent homes. A developments proposed size mix of social rent dwellings should be informed through the considerations set out in policy H4.1.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	As an experienced housebuilder in LBN with a wealth of marketing and local demand evidence, Barratt London would welcome the opportunity to work with the Council with regards to possible changes to the current housing mix and tenure policies and reserve the right to comment on the emerging evidence base documents in relation to local housing need.					H4 Housing mix	Homes	Reg18-E-121/036	Barratt London	Reg18-E-121
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly</p>	<p>[Nonetheless, there are several points of detail that could be retained or altered to better deliver this vision.]</p> <p>> Recognise the interdependence of delivering family housing and affordable housing</p>		1			H4 Housing mix	Homes	Reg18-E-121/045	Barratt London	Reg18-E-121

Comment Response	
	justify this through the submission of a viability assessment.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why town centres or locations with good access to public transport cannot deliver family homes. It is important we deliver family homes in these locations as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.</p>			2			H4 Housing mix	Homes	Reg18-E-108/030	Bellway Homes Limited	Reg18-E-108

Comment Response	
	Where family or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>It is further noted that residential developments on site allocations should provide a minimum of 5% of proposed homes as four or more bed affordable homes. In terms of one bedroom, two person units, no more than 15% of units can be provided. Bellway requests further clarification regarding the above, particularly as the policy is silent on 2 bed units. These requirements are prescriptive and onerous and should be removed from the policy.</p>		4 and 5			H4 Housing mix	Homes	Reg18-E-108/031	Bellway Homes Limited	Reg18-E-108

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/017	Homes	H4 Housing mix			1			It is also important that planning policies meet the housing types needed in a particular area – such as large family homes (3 bedroom and above) or sheltered accommodation. Without tailoring supply to demand new social housing may not have the impact that the Council and residents want. To do this well, the Council needs better data on existing housing stock and, crucially, on the wants and needs of existing tenants.	Comment noted. The housing evidence that underpins the draft plan's housing policies has extensively considered the housing needs of the borough, and has informed the requirements of our housing mix and specialist housing policies. The housing evidence base did not include a survey of demand in the borough, as the study is primarily focused on providing data on the borough's housing needs, recognising the severity of the housing crisis our residents' face. Notwithstanding this, we have taken into consideration the feedback of residents in response to the draft Local Plan, and have commissioned a piece of housing evidence base looking in further detail at the design needs of residents who have been unable to find a suitable social rent property. Developers of GLA referable schemes will need to have regard to this evidence once it is published, as per the requirements of updated Local Plan policy H11.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/020	Homes	H4 Housing mix			2			The plan should specify at least 60% 3 bed and larger homes, depending on housing need figures, on all sites.	The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs and viability. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized

Comment Response	homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Our affordable housing policy has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. However, in order for the delivery of social rent homes to be optimised, there will need to be delivery of private and intermediate tenure homes, as well as smaller homes. Delivery of these tenures will help to subsidise affordable housing delivery, and make housing developments more viable.	Over provision of luxury 1 and 2 bed flats It is noticeable that a considerable quantum of the new flats in the borough are targeted towards more wealthy individuals. This over supply of expensive luxury flats has meant that much valuable land is not being built on to accommodate local residents, many of whom are in desperate housing need. Young working age residents have no hope of being able to afford to live and work in Newham. This has contributed towards the breakup of close-knit communities and families, many of whom have had to move out of London. This process has effectively contributed towards displacement and a sense of anger towards the Council.					H4 Housing mix	Homes	Reg18-E-151/021	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/011b	Homes	H4 Housing mix			2		H4.2	<p>The Mayor recognises that requiring 40 percent family housing for all tenures is an existing policy in the 2018 Newham Local Plan and is supported by the updated SHMA 2022, and notes the London Plan Policy H10 proposes to set a unit size mix for low cost rent. The borough's viability assessment acknowledges that unit size mix has a 'fairly significant' impact on viability. The Mayor suggests that the borough applies more flexibility in the policy for unit size mix in the market and intermediate tenures in terms of requiring viability assessments in order to help encourage Fast Track Route and more affordable housing.</p>	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>
Reg18-E-130	Hadley Property Group	Reg18-E-130/117	Homes	H4 Housing mix			1			Hadley recognises the need to provide a housing mix that supports the assessed need in the Borough.	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as sufficient flexibility is provided through the wording of H4.1.	However, Hadley also recognises that different parts of the Borough may have different needs and suggests that policy should provide an element of flexibility to allow sites to reflect neighbourhood specific requirements.		1			H4 Housing mix	Homes	Reg18-E-130/118	Hadley Property Group	Reg18-E-130
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>Part 2 states that "developments on individual sites capable of delivering ten housing units or more should deliver 40 per cent of the number of new homes as family housing with three or more bedrooms. Developments on sites capable of delivering more than then units that seek to deliver less than 40 per cent family housing with three or more bedrooms are required to submit a detailed financial viability assessment". This approach could put significant pressure on the financial viability of developments and optimisation of sites.</p>		2			H4 Housing mix	Homes	Reg18-E-130/119	Hadley Property Group	Reg18-E-130

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	Hadley supports the approach to viability testing where less than 40% family housing is provided.		2			H4 Housing mix	Homes	Reg18-E-130/120	Hadley Property Group	Reg18-E-130
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p>	<p>Draft Policy H4 – Housing Mix The policy establishes the principles of what the Council will expect to see from developments. Specifically, on sites delivering 10 or more dwellings, 40% of units should be family housing and no more than 15% should be one bedroom, two person units. On site allocations, 5% of units should be for four or more bed affordable homes for families. The policy also sets out that the Council will resist the delivery of studio units</p> <p>However, higher density and tall building typologies typically contain a greater proportion of one and two-bedroom units which provide the critical mass of new homes required to transform these emerging locations into new residential neighbourhoods.</p>		4 and 5			H4 Housing mix	Homes	Reg18-E-068/072	Hollybrook Homes	Reg18-E-068

Comment Response	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly</p>			2			H4 Housing mix	Homes	Reg18-E-068/074	Hollybrook Homes	Reg18-E-068

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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	<p>Therefore, we are pleased to see that the policy allows for variations to the desired housing mix split to consider identified need, financial viability, the availability of subsidy, existing housing mix in the area and the individual circumstances of the site</p> <p>We welcome this flexibility within this policy, to enable proposals to respond appropriately to their context, whilst also addressing the needs of the Borough.</p>		1			H4 Housing mix	Homes	Reg18-E-068/075	Hollybrook Homes	Reg18-E-068
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p>			2 to 5			H4 Housing mix	Homes	Reg18-E-105/025	IQL South	Reg18-E-105

Comment Response	
	Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as there is no robust evidence to demonstrate why town centres and locations with good access to public transport cannot deliver family homes. It is important we deliver family homes in these locations as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.</p>	In particular, there are concerns that required mixes do not take account of different needs or characteristics within the borough, with highly accessible areas such as Stratford having a higher demand for smaller units and more constrained sites.		2 to 5			H4 Housing mix	Homes	Reg18-E-105/026	IQL South	Reg18-E-105

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-105/027	IQL South	Reg18-E-105

Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/013	Homes	H4 Housing mix			2		<p>[Draft Policy H4 (Housing Mix) states that: “2. Developments on individual sites capable of delivering ten housing units or more should deliver 40 per cent of the number of new homes as family housing (C3 dwelling houses) with three or more bedrooms. Developments on sites capable of delivering more than ten units that seek to deliver less than 40 per cent family housing (C3 dwelling houses) with three or more bedrooms are required to submit a detailed financial viability assessment with a Benchmark Land Value that uses an Existing Use Value plus premium approach.3. New residential developments on site allocations should provide a minimum of five per cent of proposed homes as four or more bed affordable homes for families (C3 dwelling houses).</p> <p>4. New residential developments capable of delivering ten housing units or more should deliver no more than 15 per cent of the number of new homes as one bedroom, two person units.”</p> <p>We acknowledge the housing mix requirement of Draft Policy H4 is derived from the Strategic Housing Market Assessment 2022. While the figures broadly represent the current housing need across Newham, we consider the actual mix of housing would differ across various locations, especially within and outside of town centres, and is likely to change over time. We, therefore, consider the mix is indicative and not a restrictive requirement to be met on individual sites.]</p> <p>Given that the delay in the Council bringing forward a masterplan for S15 has delayed us in making an application, these are sensitive issues for us.</p>	<p>Comment noted. This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham’s target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham’s latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough’s most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Comment noted. This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			4			H4 Housing mix	Homes	Reg18-K-012/014	IXO (New River Place) LLP	Reg18-K-012

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<p>[We propose an amendment to Policy H4 to allow for individual sites to focus on their role within the overall area so that the collective site meets an overall housing mix rather than being too prescriptive on individual sites.</p> <p>Therefore, we recommend Draft Policy H4 be reworded to reflect the latest housing needs in the latest Strategic Housing Market Assessment and allow for flexibility for other considerations, such as viability assessment and agent input on the housing market in that area.]</p> <p>Given that the delay in the Council bringing forward a masterplan for S15 has delayed us in making an application, these are sensitive issues for us.</p>					H4 Housing mix	Homes	Reg18-K-012/015	IXO (New River Place) LLP	Reg18-K-012

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/016	Homes	H4 Housing mix			2.b			<p>We would also note that the current Policy H2 (H2.1.C.ii) sets targets “within Canning Town and Custom House Regeneration Area a tenure mix of 65% of the number of proposed units as market housing and 35% affordable housing, evenly split between social housing and intermediate homes for all development sites identified for residential use”. This was set in recognition of the particular circumstances in the area and the desire to bring forward a balanced and sustainable community. The replacement plan does not appear to refer to the Regeneration Area at all, and the replacement Policy H3 omits the 65%:35% split, apparently ignoring the original purpose behind it. We request that this aspect of policy be re-stated.</p> <p>Given that the delay in the Council bringing forward a masterplan for S15 has delayed us in making an application, these are sensitive issues for us.</p>	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>LBN's proposed housing mix (Policy H4) is currently very rigid, particularly in terms of setting a maximum level of 1-bedroom units and [minimum level for 3-bedroom+ units], and we would welcome more flexibility for sites to be suitably optimised.</p>		4			H4 Housing mix	Homes	Reg18-E-096/015a	L&Q	Reg18-E-096

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>LBN's proposed housing mix (Policy H4) is currently very rigid, particularly in terms of setting a maximum level of [1-bedroom units and] minimum level for 3-bedroom+ units, and we would welcome more flexibility for sites to be suitably optimised.</p>		2			H4 Housing mix	Homes	Reg18-E-096/015 b	L&Q	Reg18-E-096

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-096/016	L&Q	Reg18-E-096

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as we do not consider there is robust evidence to demonstrate why town centres and locations with good access to public transport cannot deliver family homes. It is important we deliver family homes in these locations as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.</p>	<p><u>Housing Requirements</u></p> <p>Section H of the draft Local Plan relates to housing. Policy H4 (Housing mix) states that 10+ unit schemes should provide 40% 3+ bedrooms or are required to submit a detailed financial viability assessment with a Benchmark Land Value that uses an Existing Use Value plus premium approach. It is noted that this is a 1% increase from the 2018 Local Plan. The policy also advises that new residential developments capable of delivering 10+ housing units should deliver no more than 15 per cent of the number of new homes as one bedroom, two person units and studio units will be resisted.</p> <p>Landhold recognises and supports the need for more family housing in the borough. However, it urges LBN to add greater flexibility into the wording of Policy H4 in relation to locations that are less suitable for family housing (e.g. within or near to town and local centres, in close proximity to public transport stations etc.). In such locations, provision of one and two bed homes is often more suitable and Policy H4 should be amended to reflect this.</p>		2			H4 Housing mix	Homes	Reg18-E-056/017	Landhold Developments Ltd	Reg18-E-056

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-052/109	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why town centres and locations with good access to public transport cannot deliver family homes. It is important we deliver family homes in these locations as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.</p>	<p>Housing Mix</p> <p>LBN Draft Local Plan Policy H4 (Housing Mix) (2) requires that developments capable of delivering 10 units or more to deliver 40% of the number of new homes as family housing. Developments which seek to deliver less than this will be required to submit a detailed financial viability assessment. Draft Policy H4 (4) requires new residential developments capable of delivering 10 units or more to deliver no more than 15% of the number of new homes as one bedroom, two person units.</p> <p>It is important to highlight that not all sites are appropriate for family homes, particularly those which are closer to a town centre or station, or with higher public transport access and connectivity, as set out within the London Plan Policy H10 (Housing Size Mix). The London Plan further highlights the important role of one and two bedroom homes in freeing up existing family housing.</p> <p>As such, sufficient flexibility should be provided to ensure the draft Local Plan is consistent with the London Plan Policy H10 and to ensure such sites remain deliverable.</p>		2			H4 Housing mix	Homes	Reg18-E-073/010	Notting Hill Genesis	Reg18-E-073

Reg18 -E-073	Notting Hill Genesis	Reg18- E- 073/030	Homes	H4 Housing mix			2		<p>[Appendix D] Policy H4 Housing Mix Page 176 Proposed Suggested Amendments:</p> <p>1. All new residential developments should deliver a mix and balance of housing types and sizes. The appropriate mix of housing sizes, types and tenures will be determined through:</p> <ul style="list-style-type: none"> a. primarily the consideration of the need to secure quality, mixed and balanced communities; and b. evidence of housing need as set out in Newham's latest Strategic Housing Market Assessment; and c. development viability; and d. the availability of subsidy; and e. the existing mix of housing in the area; and f. the individual circumstances of the site in terms of site conditions, local context and site features, particularly on sites delivering below ten units. <p>2. Developments on individual sites capable of delivering ten housing units or more should deliver 40 per cent of the number of new homes as family housing (C3 dwelling houses) with three or more bedrooms. Developments on sites capable of delivering more than ten units that seek to deliver less than 40 per cent family housing (C3 dwelling houses) with three or more bedrooms are required to submit a detailed financial viability assessment with a Benchmark Land Value that uses an Existing Use Value plus premium approach. The individual circumstances of the site in terms of site conditions, local context and site features should be taken into account.</p> <p>3. New residential developments on site allocations should provide a minimum of five per cent of proposed homes as four or more bed affordable homes for families (C3 dwelling houses).</p> <p>4. New residential developments capable of delivering ten housing units or more should</p>	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>
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										<p>deliver no more than 15 per cent of the number of new homes as one bedroom, two person units.</p> <p>5. The Council will resist the delivery of studio units.</p> <p>Reason / Comment</p> <p>It is important to highlight that not all sites are appropriate for family homes, particularly those which are closer to a town centre or station, or with higher public transport access and connectivity, as set out within the London Plan Policy H10 (Housing Size Mix). The London Plan further highlights the important role of one and two bedroom homes in freeing up existing family housing.</p> <p>As such, sufficient flexibility should be provided to ensure the draft Local Plan is consistent with the London Plan Policy H10 and to ensure such sites remain deliverable.</p>	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	Draft Policy H4: Housing Mix The requirement for a mix and balance of housing types and sizes as set out under Part 1. of draft Policy H4 is supported.		1			H4 Housing mix	Homes	Reg18-E-078/042	Redefine Hotels Portfolio IV Ltd	Reg18-E-078
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>However, it is considered that the specific requirements set out under Parts 2-5 could quickly become outdated and superseded during the Plan period through updates to the Council's Local Housing Need Assessment.</p> <p>Whilst the requirements set out under Parts 2-5 may be appropriate at this point in time, this is a borough-wide basis which does not account for contextual differences between individual sites. The wording of the policy therefore needs to be flexible to allow for proposals to appropriately respond to demand, as and when they come forward.</p>		2 to 5			H4 Housing mix	Homes	Reg18-E-078/043	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as we do not consider there is robust evidence to demonstrate why locations like town centres and areas with good access to public transport cannot deliver family homes. It is important we deliver family homes in these locations as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.	In addition, the demand for certain house types such as four bedroom affordable family homes and studios, for example, will have very different locational requirements. Therefore the policy wording needs to recognise and allow for the fact that some forms of housing will be more appropriate in certain locations than others.		2			H4 Housing mix	Homes	Reg18-E-078/044	Redefine Hotels Portfolio IV Ltd	Reg18-E-078
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p>	Therefore as a whole it is important the policy promotes consideration of mix on a site by site basis, to include overall scheme deliverability which Part 1 seems to do and that this is not undermined or mislead through Parts 2-5.		2 to 5			H4 Housing mix	Homes	Reg18-E-078/045	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	
	Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as this would unnecessarily duplicate the requirements of Policy H4.1.	Recommendations To ensure the Policy is clear and the Plan can be considered to be positively prepared in satisfying the tests of soundness at NPPF 35, we would recommend the following amendments to draft policy wording: · Policy H4 (Part 2.) – “Developments on individual sites capable of delivering ten housing units or more should deliver 40 per cent of the number of new homes as family housing (C3 dwelling houses) with three or more bedrooms. Developments on sites capable of delivering more than ten units that seek to deliver less than 40 per cent family housing (C3 dwelling houses) with three or more bedrooms should demonstrate why this is considered acceptable and appropriate based on up to date local needs evidence, market demand and site-specific circumstances and are required to submit a be supported by a detailed financial viability assessment with a Benchmark Land Value that uses an Existing Use Value plus premium approach.”		2			H4 Housing mix	Homes	Reg18-E-078/046	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as we do not consider there is robust evidence to demonstrate why town centres are unsuitable for the delivery of larger family homes. It is important we deliver family homes in these locations as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.	[Recommendations To ensure the Policy is clear and the Plan can be considered to be positively prepared in satisfying the tests of soundness at NPPF 35, we would recommend the following amendments to draft policy wording:] · Policy H4 (Part 3.) – “New residential developments on site allocations outside of town centres should provide a minimum of five per cent of proposed homes as four or more bed affordable homes for families (C3 dwelling houses).”		3			H4 Housing mix	Homes	Reg18-E-078/047	Redefine Hotels Portfolio IV Ltd	Reg18-E-078
	This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4. The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the	[Recommendations To ensure the Policy is clear and the Plan can be considered to be positively prepared in satisfying the tests of soundness at NPPF 35, we would recommend the following amendments to draft policy wording:] · Policy H4 (Part 4.) – “New residential developments capable of delivering ten housing units or more should deliver no more than 15 per cent of the number of new homes as one bedroom, two person units unless it can be demonstrated this is considered acceptable and appropriate based on up to date local needs evidence, market demand and sitespecific circumstances, taking account of scheme deliverability. ”		4			H4 Housing mix	Homes	Reg18-E-078/048	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	viability of scheme delivery. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/049	Homes	H4 Housing mix			5			<p>[Recommendations To ensure the Policy is clear and the Plan can be considered to be positively prepared in satisfying the tests of soundness at NPPF 35, we would recommend the following amendments to draft policy wording:]</p> <p>· Policy H4 (Part 5.) – “The Council will resist the delivery of studio units unless under exceptional circumstances it is demonstrated that these are requirement to meet an identified local need and/or market demand, taking account of site-specific circumstances and scheme deliverability.”</p>	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham’s target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham’s latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough’s most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.</p> <p>The wording of H4, which requires the delivery of a mix and balance of housing types and sizes seeks to address the significant affordability challenges the borough faces. By delivering an improved mix of housing types in existing neighbourhoods we are seeking to increase affordable housing delivery across the borough. We have also amended the wording of the implementation text in H3.1 to include explicit support for the delivery of 100% affordable housing schemes.</p>	<p>“Mixed and balanced communities” are problematic in a community like Newham. Such phrasing may be useful in other areas of England and London, where national and regional planning policy asserts this language in policy. However in Newham we need to define ‘mixed and balanced communities’ more rigorously if we are to use the language at all. The appropriate mix of housing sizes, types and tenures should now be determined through “primarily the need to secure high quality, genuinely affordable housing at low-cost rent”, rather than referenced to undefined ‘mixed and balanced’ communities, which the recent literature on housing provision in London demonstrates are neither mixed nor balanced but rather “socially cleansed”.</p>		1.a			H4 Housing mix	Homes	Reg18-E-098/016	Resident	Reg18-E-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				1			H4 Housing mix	Homes	Reg18-E-098/019	Resident	Reg18-E-098
				2			H4 Housing mix	Homes	Reg18-E-098/026	Resident	Reg18-E-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Newham's Strategic Housing Market Assessment shows a significant need to deliver both market and affordable family-sized homes. Newham's article 4 direction places limit on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing cannot be converted to shared housing unless they meet one of the policy exceptions set out in H2.	The DP must be clear in which tenure new build family housing is placed. It does not deliver family housing needs, if family housing is unaffordable and/or delivered in new build developments which merely lead to shared renting for well off young professionals. The family housing in each development must be delivered in the affordable housing bracket.		2			H4 Housing mix	Homes	Reg18-E-098/027	Resident	Reg18-E-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Comment noted. As per the Greater London Authority's recently published draft Viability LPG, Local Planning Authorities should ensure that viability consultants are properly qualified, experienced and resourced; and have capacity to undertake a thorough Development Viability assessment. There are a limited range of suppliers with significant expertise to undertake reviews of viability assessments which have to be carried out in accordance with RICS guidelines. Due to the specialist nature of this work, Newham, and other local authorities, have struggled to recruit and retain in-house viability expertise. Newham has appointed BNP Paribas as a dedicated viability consultant for the Council. The majority of BNP Paribas work is for other local authorities and most London boroughs use them to provide reviews. The Council and BNP Paribas ensure no conflict of interest issues arise when reviewing different proposals' viability assessments. Moreover, the manifesto commitment was "employ our own viability assessor to forensically scrutinise developer proposals." The employment of BNPP fulfils this commitment.</p> <p>Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-098/028	Resident	Reg18-E-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	A <i>minimum</i> of at least 50% family homes should be sought across all developments		2			H4 Housing mix	Homes	Reg18-E-098/029a	Resident	Reg18-E-098

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/029 b	Homes	H4 Housing mix			2			[A <i>minimum</i> of at least 50% family homes should be sought across all developments] and at least half of these should be socially rented.	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.
Reg18-E-104	Resident	Reg18-E-104/013	Homes	H4 Housing mix			1.c			Suggest draft Policy H4 1 (c) be amended so it reads: “[The appropriate mix of housing sizes, types and tenures will be determined through]... due regard to viability requirements set out in national and regional planning policy, and local early, continuous and robust scrutiny of scheme viability.”	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham’s target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham’s latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough’s most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p>

Comment Response	
	Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-011	Resident	Reg18-T-011/004	Homes	H4 Housing mix						[Keep it]	<p>Support noted. However, this policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>
Reg18-T-019	Resident	Reg18-T-019/012	Homes	H4 Housing mix						[Add to it] Need more info	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/033	Homes	H4 Housing mix			2			[Add to it] There needs to be a range of housing available for people with larger families, 2, 3, 4 bedroom properties not just studios and 1 beds.	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>
Reg18-T-034	Resident	Reg18-T-034/034	Homes	H4 Housing mix						[Add to it] People need gardens and access to outside space.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan includes requirements for the provision of private amenity space for new homes under policy H11. Other policies in the plan related to Green and Water Spaces and Neighbourhoods also seek to

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
											address these concerns by helping to protect and improve residents' access to open spaces.
Reg18-T-057	Resident	Reg18-T-057/030	Homes	H4 Housing mix						[Add to it] W	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-088	Resident	Reg18-T-088/014	Homes	H4 Housing mix						[Change it] sharing housing scheme should stop right now, I seen one of the client he has no privacy, no health and safety boundaries, his kitchen was not safe, he was a diabetic 82 year patient was living in sharing housing scheme and sometimes he cant control his pee because other sharing resident was using bathroom.	A change to this policy approach has not been made. We did not consider this change to be necessary as requirements in policies H9 and H11 should help address these concerns. This includes the need for accommodation to have a management plan. These concerns will also be partly addressed through the borough's landlord licencing scheme, which requires rented properties in the borough to meet required quality standards. If you have concerns regarding a particular property please contact the Private Sector Housing team via email at privatehousing@newham.gov.uk .

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted. However, this policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4. The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.	[Keep it]					H4 Housing mix	Homes	Reg18-T-105/015	Resident	Reg18-T-105
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan's policies requiring the delivery of affordable and family-sized homes, including 5% four bedroom homes on site allocations, will help to address issues of overcrowding in the borough.	[Add to it] Again Newham is overcrowded and suffering from... overcrowding		1			H4 Housing mix	Homes	Reg18-T-109/040	Resident	Reg18-T-109

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as policy D6 (Neighbourliness) requires developments to avoid unacceptable exposure to noise.	[Add to it] Again Newham is [overcrowded] and suffering from noise pollution,					H4 Housing mix	Homes	Reg18-T-109/041	Resident	Reg18-T-109

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5).</p> <p>However The Local Plan cannot deliver the change you have requested.</p> <p>The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach services,</p>						H4 Housing mix	Homes	Reg18-T-109/042	Resident	Reg18-T-109

Comment Response		such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-109	Resident	Reg18-T-109/043	Homes	H4 Housing mix						[Add to it] Again Newham is [overcrowded] and suffering from [noise pollution, overcrowding and ASB] as well as flytipping	<p>The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues:</p> <ul style="list-style-type: none"> - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal <p>Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter</p> <p>We have also provided the Waste team with your comments.</p>
Reg18-T-126	Resident	Reg18-T-126/012	Homes	H4 Housing mix						[Add to it]	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-136/110	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	The Berkeley Group supports the overarching approach to housing mix that is set out in point 1 of policy H4. In particular, we welcome the acknowledgement that the appropriate mix of housing sizes, types and tenures will be determined through a number of factors including evidence of housing need which will be set out in the latest SHMA, development viability, availability of subsidy and the individual circumstances of the site.		1			H4 Housing mix	Homes	Reg18-E-136/111	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets</p>	<p>Point 2 outlines a requirement for developments to deliver 40% of new homes as family homes with three or more bedrooms and developments delivering less than that are required to submit a detailed FVA with a Benchmark Land Value that uses an Existing Use Value plus premium approach and point 3 outlines a requirement for new residential developments on site allocations to provide a minimum of 5% of proposed homes as four or more bed affordable homes for families. Whilst the Berkeley Group understands there is a need for family homes in the borough it may not always be viable for former gasworks sites that are subject to exceptional abnormal costs to delivery this percentage of family sized homes.</p>		2			H4 Housing mix	Homes	Reg18-E-136/112	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.										
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.	Point 2 should acknowledge the role that 2 bedroom 4 person homes can play in meeting family housing need both in terms of being able to provide sufficient space for a young family but also by being more affordable		2			H4 Housing mix	Homes	Reg18-E-136/113	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly</p>			4 and 5			H4 Housing mix	Homes	Reg18-E-136/114	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	justify this through the submission of a viability assessment.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan encourages the delivery of homes aligned with our evidence of housing need. Newham's latest evidence of housing needs suggests that around 60 per cent of Newham's housing need is for family-sized homes (three beds or larger), with 6% of overall need being for four bedroom homes. Accordingly, the policy sets minimum targets for the provision of both family-sized homes within major development proposals and affordable four-bedroom homes on site allocations. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.	The Berkeley Group has suggested some amendments to the wording of this policy in Appendix 12 which includes removing a specific percentage requirement for 4 bedroom homes on site allocations and instead incorporating wording that seeks to encourage or maximise 4 bedroom homes where possible. The Berkely Group proposed amendements to draft policy: 3. New residential developments on site allocations should <u>seek to maximise the number of</u> provide a minimum of five per cent of proposed homes as four or more bed affordable homes for families (C3 dwelling houses).		3			H4 Housing mix	Homes	Reg18-E-136/115	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p>			4 and 5			H4 Housing mix	Homes	Reg18-E-136/116	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>There is concern that the prescriptive mix set out in Parts 2-5 of the policy do not take account of the need to determine the appropriate mix considered individual circumstances of the sites, as set out in Part 1 f.</p> <p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2 to 5			H4 Housing mix	Homes	Reg18-E-124/012	Stratford East London Partners LLP	Reg18-E-124

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as we do not consider there is robust evidence to demonstrate why locations like Stratford cannot deliver family homes. It is important we deliver family homes in this location as this is where a significant proportion of Newham's housing target is set to be delivered. As such this location is of strategic importance in ensuring we deliver sufficient new family homes in the borough.	In applying prescriptive mixes boroughwide, these will not take account of different local needs or characteristics within the borough, with highly accessible areas around Stratford having a higher demand for smaller units and higher density sites that don't lend themselves to high amounts of large dwellings.		2			H4 Housing mix	Homes	Reg18-E-124/013	Stratford East London Partners LLP	Reg18-E-124
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p>	The restriction on the provision of studio units proposed in Part 5 does not reflect the strong demand in London for studio units, which are an important part of the housing mix and create and accessible means of home ownership in inner London. Whilst studio units might not be appropriate in all areas in the borough, there is a strong demand for studios in high density areas and town centres, such as Stratford Metropolitan Centre.		5			H4 Housing mix	Homes	Reg18-E-124/014	Stratford East London Partners LLP	Reg18-E-124

Comment Response		Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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Representation Reference		

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>Therefore, we suggest refinements are made to the unit mix requirements in Parts 2-5 to propose the mixes as boroughwide targets linked to affordable rented housing provision, where demand for family-sized units is greater. [Specifically, Part 5 should be amended to allow flexibility for the provision of studios and could set out where these could be appropriate, such as highly accessible sites, opportunity areas and town centres..]</p> <p>The above refinements would allow flexibility for the proposed market mixes to respond to market demand and allow flexibility for proposals respond to local need and site characteristics.</p>		2			H4 Housing mix	Homes	Reg18-E-124/015 a	Stratford East London Partners LLP	Reg18-E-124

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>Specifically, Part 5 should be amended to allow flexibility for the provision of studios and could set out where these could be appropriate, such as highly accessible sites, opportunity areas and town centres..</p> <p>The above refinements would allow flexibility for the proposed market mixes to respond to market demand and allow flexibility for proposals respond to local need and site characteristics.</p>		5			H4 Housing mix	Homes	Reg18-E-124/015 b	Stratford East London Partners LLP	Reg18-E-124

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-111/018	The Silvertown Partnership LLP	Reg18-E-111

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	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-111/077	The Silvertown Partnership LLP	Reg18-E-111
	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as this requirement has informed the modelling of site allocations.</p>			2			H4 Housing mix	Homes	Reg18-E-111/078	The Silvertown Partnership LLP	Reg18-E-111

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	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-111/079	The Silvertown Partnership LLP	Reg18-E-111

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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Considering this target by habitable rooms would lead to a much lower level of family housing by unit in new developments, and is therefore not considered to be appropriate.</p>			2			H4 Housing mix	Homes	Reg18-E-111/080b	The Silvertown Partnership LLP	Reg18-E-111

Reg18 -E-080	Transport Trading Limited Properties Limited	Reg18- E- 080/033	Homes	H4 Housing mix			2 to 5		<p>Draft Policy H4: Housing Mix</p> <p>We note that Draft Policy H4 Part 1 provides some flexibility for residential developments to provide a mix and balance of housing types and sizes, determined through the consideration of need to secure mixed and balanced communities, evidence of housing need, development viability, the availability of subsidy, the existing mix of housing in the area, and the individual circumstances of the site.</p> <p>However, Part 2 of the policy requires 40% of new homes to be delivered as family housing (with 3 or more bedrooms), and if this is not provided a financial viability assessment is required to be submitted. Part 3 and 4 of the policy provide minimum requirements for the delivery of four or more bedroom homes (minimum 5%), and maximum requirements for the delivery of one bedroom two person homes (maximum 15%). Part 5 of the policy seeks to resist the delivery of studio units.</p> <p>As such there is inconsistency between Part 1 of the policy, which allows an element of flexibility on the proposed unit mix, and Parts 2 - 54 [5] which provide specific targets. Whilst the findings from the LBN Strategic Housing Market Assessment are acknowledged, we consider that the policy should be more positively worded to enable the housing mix of schemes to be considered on a site specific basis, taking account of the locality and the nature of the development.</p> <p>A blanket approach to housing mix cannot be applied as it provides limited flexibility for appropriate unit mixes to be secured in respect of different tenures. For example, family intermediate homes (e.g. 3 bedroom shared ownership homes), are often not affordable for occupiers or viable to deliver by RPs.</p>	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.</p>	<p>Concerns about the provisions relating to Build to Rent housing and affordable housing, in terms of the deliverability of this type of housing. Draft Policy H4 (Housing mix) proposes a requirement for a minimum of 40% family homes (3+ beds) across all types of new housing, unless it can be demonstrated it is not viable to do so. Furthermore, residential development on Site Allocations should provide a minimum of 5% 4 bed homes and sites delivering ten or more homes should deliver no more than 15% 1 bed 2 person units.</p> <p>There is insufficient recognition within draft Policy H4, or in draft Policy H5 (Build to Rent housing) of the particular character of Build to Rent, which tends to be focussed in more urban, highly accessible locations, which are often less suitable for family housing. The policy should reflect this and ensure there is flexibility for housing mix in covenanted Build to Rent developments.</p> <p>[...]</p> <p><u>Recommendation 3: Amend draft Policy H4 to introduce flexibility for housing mix in covenanted Build to Rent developments, given that such sites are often less suitable for family housing.</u></p>		2			H4 Housing mix	Homes	Reg18-E-102/011	Unibail-Rodamco-Westfield	Reg18-E-102

Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/019	Homes	H4 Housing mix			2		<p>Housing Mix</p> <p>Policy H4 of the draft Local Plan states that 40% of the homes within all residential developments, including build to rent (BTR), should be three of more beds. Policy H4 also states “the Council will resist the delivery of studios”.</p> <p>The British Property Federation (BPF) reports within its publication ‘Who lives in Build-to-Rent (March 2022)’:</p> <ul style="list-style-type: none"> · The dominant age band of residents of BTR in London are between 25 and 34 years old. Renters within this age band comprise over double any other age band. · Couples or sharers are the main occupiers of BTR in London – they occupy 70% of the homes. 25% are occupied by single people and less than 5% are occupied by families. · This has resulted in the majority (77%) of BTR homes delivered to date having one or two bedrooms. Studios and three bed homes provide the remainder. · “London needs to build 66,000 new homes each year to meet housing demand. Build to Rent represents an enormous opportunity to help tackle London’s housing crisis while also improving the quality of private renting in the capital”. <p>The above is reflective of WJG’s own evidence, across the UK and in London. WJG has delivered over 2,000 BTR homes across the UK, with another 2,000 homes under construction. Policy H4 is currently inflexible and does not align with the BTR market. WJG requests that Policy H4 is amended to allow the applicant to justify an alternative unit mix for BTR developments, particularly in locations which are considered less suitable for family living.</p>	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham’s Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham’s housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.</p>
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	Support noted.	<p>Residential Unit Mix (Policy H4)</p> <p>We support the approach undertaken within Part 1 of the policy that the specific appropriate mix of housing sizes, types and tenures for a specific site should be determined through:</p> <ul style="list-style-type: none"> • a. primarily the consideration of the need to secure quality, mixed and balanced communities; and • b. evidence of housing need as set out in Newham's latest Strategic Housing Market Assessment; and • c. development viability; and • d. the availability of subsidy; and • e. the existing mix of housing in the area; and • f. the individual circumstances of the site in terms of site conditions, local context and site features, particularly on sites delivering below ten units. <p>It is considered that site specific circumstances, as set out within the above considerations, is the correct approach for determining the mix requirements on a site.</p>		1			H4 Housing mix	Homes	Reg18-E-100/037	Zirconia Stratford Unit Trust	Reg18-E-100

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	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>However, we therefore object to the approach within Parts 2 to 5 of the policy which then applies specific mix requirements onto sites, which directly contradicts the approach taken within Part 1 of the policy. These specific requirements include:</p> <ul style="list-style-type: none"> • (Part 2) Schemes of 10+ residential units should deliver 40% of new homes as family housing with three or more bedrooms. If not, a viability assessment must be provided. 		2			H4 Housing mix	Homes	Reg18-E-100/038 a	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan encourages the delivery of homes aligned with our evidence of housing need. Newham's latest evidence of housing needs suggests that around 60 per cent of Newham's housing need is for family-sized homes (three beds or larger), with 6% of overall need being for four bedroom homes. Accordingly, the policy sets minimum targets for the provision of both family-sized homes within major development proposals and affordable four-bedroom homes on site allocations. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.	[However, we therefore object to the approach within Parts 2 to 5 of the policy which then applies specific mix requirements onto sites, which directly contradicts the approach taken within Part 1 of the policy. These specific requirements include: <ul style="list-style-type: none"> • (Part 2) Schemes of 10+ residential units should deliver 40% of new homes as family housing with three or more bedrooms. If not, a viability assessment must be provided.] • (Part 3) New residential developments on site allocations should provide a minimum of 5% 4 or more bed affordable homes. 		3			H4 Housing mix	Homes	Reg18-E-100/038 b	Zirconia Stratford Unit Trust	Reg18-E-100

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-100	Zirconia Stratford Unit Trust	Reg18-E-100/038c	Homes	H4 Housing mix			4			<p>[However, we therefore object to the approach within Parts 2 to 5 of the policy which then applies specific mix requirements onto sites, which directly contradicts the approach taken within Part 1 of the policy. These specific requirements include:</p> <ul style="list-style-type: none"> • (Part 2) Schemes of 10+ residential units should deliver 40% of new homes as family housing with three or more bedrooms. If not, a viability assessment must be provided. • (Part 3) New residential developments on site allocations should provide a minimum of 5% 4 or more bed affordable homes.] • (Part 4) New residential developments of 10+ residential units should deliver no more than 15% as one bedroom units. 	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-100	Zirconia Stratford Unit Trust	Reg18-E-100/038d	Homes	H4 Housing mix			5			<p>However, we therefore object to the approach within Parts 2 to 5 of the policy which then applies specific mix requirements onto sites, which directly contradicts the approach taken within Part 1 of the policy. These specific requirements include:</p> <ul style="list-style-type: none"> • (Part 2) Schemes of 10+ residential units should deliver 40% of new homes as family housing with three or more bedrooms. If not, a viability assessment must be provided. • (Part 3) New residential developments on site allocations should provide a minimum of 5% 4 or more bed affordable homes. • (Part 4) New residential developments of 10+ residential units should deliver no more than 15% as one bedroom units.] • (Part 5) Studio units are resisted entirely. 	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>

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Comment Response	
	In circumstances where family or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.
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Comment Response		developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation.
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	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>Furthermore, studios are a very appropriate form of residential typology for managed Build to Rent developments, where occupants may only be seeking a 1-3 year tenancy and a studio meets their needs and aspirations at that time, but the option remains to potentially change to a different sized unit in the same Build to Rent scheme in the future.</p>		5			H4 Housing mix	Homes	Reg18-E-100/041b	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			4 and 5			H4 Housing mix	Homes	Reg18-E-100/042	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Accordingly, we consider that Part 2 of the policy should afford clearer flexibility in its wording for all developments of 10 units or more to deliver 40% 3+ bed units;</p> <p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			2			H4 Housing mix	Homes	Reg18-E-100/043 a	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	and likewise Part 4 of the policy should provide clearer flexibility for certain developments to provide more than 15% 1-bed 2-person units based on tenure, location and it's specific need.		4			H4 Housing mix	Homes	Reg18-E-100/043 b	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			5			H4 Housing mix	Homes	Reg18-E-100/044	Zirconia Stratford Unit Trust	Reg18-E-100
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not</p>			1			H4 Housing mix	Homes	Reg18-E-100/045	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	<p>resulted in a change as we did not consider this change to be appropriate as Newham’s Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation.</p>
Comment	<p>a. primarily the consideration of the need to secure quality, mixed and balanced communities; and</p> <p>b. evidence of housing need as set out in Newham’s latest Strategic Housing Market Assessment; and</p> <p>c. development viability; and d. the availability of subsidy; and</p> <p>e. the existing mix of housing in the area; and</p> <p>f. the individual circumstances of the site in terms of site conditions, local context and site features, particularly on sites delivering below ten units.’</p> <p>- Proposed wording: Change wording to: ‘1. All new residential developments should deliver a mix and balance of housing types and sizes. The appropriate mix of housing sizes, types and tenures will be determined through:</p> <p>a. primarily the consideration of the need to secure quality, mixed and balanced communities; and</p> <p>b. evidence of housing need as set out in Newham’s latest Strategic Housing Market Assessment; and</p> <p>c. development viability; and d. the availability of subsidy; and</p> <p>e. the existing mix of housing in the area; and</p> <p>f. the individual circumstances of the site <u>and proposed development</u> in terms of <u>proposed residential typology (e.g. built to rent)</u>, site conditions, local context, and site features, particularly on sites delivering below ten units.’</p>
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>Table 4: Summary of Recommended Changes to Policy H4 (Residential Unit Mix)</p> <p>- Existing wording: '2. Developments on individual sites capable of delivering ten housing units or more should deliver 40 per cent of the number of new homes as family housing (C3 dwelling houses) with three or more bedrooms. Developments on sites capable of delivering more than ten units that seek to deliver less than 40 per cent family housing (C3 dwelling houses) with three or more bedrooms are required to submit a detailed financial viability assessment with a Benchmark Land Value that uses an Existing Use Value plus premium approach.</p> <p>...</p> <p>- Proposed wording: Change wording to: 'Subject to the outcome of the considerations set out in part 1 of this policy:</p> <p>2. Developments on individual sites capable of delivering ten housing units or more should seek to deliver 40 per cent of the number of new homes as family housing (C3 dwelling houses) with three or more bedrooms <u>where appropriate and viable. Developments on sites capable of delivering more than ten units that seek to deliver less than 40 per cent family housing (C3 dwelling houses) with three or more bedrooms are required to submit a detailed financial viability assessment with a Benchmark Land Value that uses an Existing Use Value plus premium approach.</u></p>		2			H4 Housing mix	Homes	Reg18-E-100/046 a	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan encourages the delivery of homes aligned with our evidence of housing need. Newham's latest evidence of housing needs suggests that around 60 per cent of Newham's housing need is for family-sized homes (three beds or larger), with 6% of overall need being for four bedroom homes. Accordingly, the policy sets minimum targets for the provision of both family-sized homes within major development proposals and affordable four-bedroom homes on site allocations. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.	<p>Table 4: Summary of Recommended Changes to Policy H4 (Residential Unit Mix)</p> <p>...</p> <p>3. New residential developments on site allocations should provide a minimum of five per cent of proposed homes as four or more bed affordable homes for families (C3 dwelling houses).</p> <p>...</p> <p>- Proposed wording: Change wording to: 'Subject to the outcome of the considerations set out in part 1 of this policy:</p> <p>...</p> <p>3. New residential developments on site allocations should seek to provide a minimum of five per cent of proposed homes as four or more bed affordable homes for families (C3 dwelling houses) where appropriate and viable.</p>		3			H4 Housing mix	Homes	Reg18-E-100/046 b	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>	<p>Table 4: Summary of Recommended Changes to Policy H4 (Residential Unit Mix)</p> <p>...</p> <p>4. New residential developments capable of delivering ten housing units or more should deliver no more than 15 per cent of the number of new homes as one bedroom, two person units.</p> <p>- Proposed wording: Change wording to: 'Subject to the outcome of the considerations set out in part 1 of this policy:</p> <p>...</p> <p>4. New residential developments capable of delivering ten housing units or more should seek to deliver no more than 15 per cent of the number of new homes as one bedroom, two person units where appropriate and viable.</p>		4			H4 Housing mix	Homes	Reg18-E-100/046c	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's target to deliver 40 per cent family homes and no more than 15% one-bedroom homes has been informed by evidence of housing needs. Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery.</p> <p>Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p>			5			H4 Housing mix	Homes	Reg18-E-100/047	Zirconia Stratford Unit Trust	Reg18-E-100

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-100	Zirconia Stratford Unit Trust	Reg18-E-100/054	Homes	H4 Housing mix			1			<ul style="list-style-type: none"> Policy H4 – allow clearer flexibility to unit mix requirements based on location and residential tenure 	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as we do not consider there is robust evidence to demonstrate why locations like town centres and areas with good access to public transport cannot deliver family homes. It is important we deliver family homes in these locations as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation.</p>
Reg18-E-070	Aston Mansfield	Reg18-E-070/074	Homes	H5 Build to Rent housing						<p>e. H5: Build to Rent Housing - Would you keep, change or add something to this policy?</p> <p>No comment</p>	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	Ballymore supports the inclusion of a Build to Rent policy within the draft Local Plan, the delivery of Build to Rent (BtR) housing can often improve the viability of a scheme (particularly as part of a wider strategic site) and therefore will assist the Council in meeting their housing targets over the Plan period.					H5 Build to Rent housing	Homes	Reg18-E-077/032	Ballymore Group	Reg18-E-077
	Support noted.	The Build to Rent requirements set out within draft Policy H5 largely reflect Policy H11 in the London Plan and are therefore supported, [...]					H5 Build to Rent housing	Homes	Reg18-E-077/033	Ballymore Group	Reg18-E-077
	A change to this policy approach has not been made. We did not consider this change to be necessary as we have delivered these tenures on build to rent schemes previously using our adopted development plan. It is considered the issue of management can be dealt with adequately via the provision of separate buildings or management regimes	[The Build to Rent requirements set out within draft Policy H5 largely reflect Policy H11 in the London Plan and are therefore supported,] with the exception of the affordable housing requirement. At present, the draft policy requires affordable housing within BtR schemes to be provided in line with draft policy H3 – i.e. a 65/35 tenure split between social rent and intermediate housing. However, it is not appropriate to provide social rent housing within a Build to Rent block as this would require the provision of a separate core and for the social rented accommodation to be under separate management (i.e. a Registered Social Landlord). DMR (Discounted Market Rent) housing is therefore the only appropriate affordable tenure within Build to Rent housing, and the draft policy should be amended to reflect London Plan policy H11 in this regard.		3			H5 Build to Rent housing	Homes	Reg18-E-077/034	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>PRS - Policies that discourage more PRS homes</p> <p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the approach in the Local Plan reflects regional and national policies. The National Planning Policy Framework (paragraph 62, p.17) requires Local Planning Authorities to assess the housing needed for different groups in the community and reflect this in planning policies. This includes people who rent their homes. Similarly, the London Plan (at 4.11.1, p.194) states that boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes.</p> <p>In the draft Local Plan we have policies on purpose built rented accommodation, houses in multiple occupation and large-scale purpose-built shared living developments, which include quality standards new developments are required to meet. However, we do not have influence over dwelling houses that change to rented accommodation or historic lawful houses in multiple occupation, as these developments do not require planning permission.</p>						H5 Build to Rent housing	Homes	Reg18-Ae-001/178	East Ham Assembly	Reg18-Ae-001

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-093	Greater London Authority	Reg18-E-093/012	Homes	H5 Build to Rent housing			4			The Mayor notes that the draft Policy H5 states that if Built to Rent (BTR) developments are unable to deliver the required affordable housing (65 percent social rented), then they will need to submit a detailed viability assessment for both Built for Sale and Built to Rent. If BTR delivers less affordable housing, then a revenue subsidy may be considered as an alternative. The Mayor recognises that this is an existing policy in the 2018 Newham Local Plan with an ongoing payment in lieu as revenue subsidy which is already set. We understand from discussions that the policy implementation hasn't worked as intended. Therefore, the Mayor recommends that this policy is amended such that on site social rented housing is given preference rather than requiring payment into a revenue subsidy, if the social rented housing provided is less than 65 per cent.	This policy approach has now changed due to the removal of the additional wording about the appropriateness of a revenue subsidy. Please see the new wording in Policy H5.
Reg18-E-130	Hadley Property Group	Reg18-E-130/121	Homes	H5 Build to Rent housing			1			Hadley notes the criteria set out for developments to qualify as Build to Rent and acknowledges the requirement for Build to Rent housing as a block or phase within a larger development to deliver affordable housing. However, London Plan Policy H11 sets out that the affordable housing offer within Build to Rent schemes can be solely discounted market rent. The DLP should reflect this requirement and should update Policy H5 accordingly rather than refer to Policy H3 which requires both social and affordable rent.	A change to this policy approach has not been made. We did not consider this change to be appropriate as our proposed affordable housing target for Build to Rent homes is based on our evidence of housing needs. The Strategic Housing Market Assessment provides a robust analysis of affordable housing needs across the plan period, informed by a household's ability to meet their housing costs and aspiration for home ownership. This needs evidence has informed our affordable housing target for the new plan period, with our Build to Rent target seeking to reflect the tenure split of our affordable housing target set out within policy H3.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-068	Hollybrook Homes	Reg18-E-068/077	Homes	H5 Build to Rent housing						Draft Policy H5 – Build to Rent Housing We are pleased to see that the Council recognise the importance of diversification in the housebuilding industry, particularly in light of changing living and working patterns that have become particularly prevalent following the covid-19 pandemic, through the inclusion of draft Policy H5.	Comment noted.
Reg18-E-068	Hollybrook Homes	Reg18-E-068/078	Homes	H5 Build to Rent housing						We welcome the wording of draft Policy H5 which broadly aligns with Policy H11 of the London Plan.	Support noted.
Reg18-E-068	Hollybrook Homes	Reg18-E-068/079	Homes	H5 Build to Rent housing						. We would seek that site allocations are afforded the same flexibility to introduce a range of housing products to the market.	Comment noted. This tenure of housing will be supported in a variety of locations, including on site allocations.
Reg18-T-011	Resident	Reg18-T-011/005	Homes	H5 Build to Rent housing						[Keep it]	Support noted.
Reg18-T-019	Resident	Reg18-T-019/013	Homes	H5 Build to Rent housing						Need more inform	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-057	Resident	Reg18-T-057/031	Homes	H5 Build to Rent housing						[Add to it] W	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-074	Resident	Reg18-T-074/008	Homes	H5 Build to Rent housing						[Keep it] Hi prices low paid it difficult to buy in London	Support noted. However, this policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	and multiple affordability challenges our residents face. Please see the new wording in Policy H3.										
	This policy approach has now changed to require new residential developments on sites with the capacity to deliver ten dwellinghouses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. Please see the new wording in Policy H3.	[Add to it] Build new houses allow easier ways to buy houses					H5 Build to Rent housing	Homes	Reg18-T-082/011	Resident	Reg18-T-082
	Comment noted. Alongside delivering homes, the Local Plan also secures funding and land for the delivery of new infrastructure including new parks, health centres and schools. More details about where these will be located is in policy BFN1 and the neighbourhoods chapter. The Local Plan's spatial strategy is organised around the idea of 15 minute neighbourhoods, which aims to ensure that all residents can live within a 15 minute walk of key facilities such as shops, schools, parks and workspaces. This is so that residents do not have to travel so far to reach these essential services.	[Add to it] Need to build new houses with park, I think council should build in that sequence like..... housing colony, surgery, mini hospital, library, school, leisure centre, care home, community park, police station, mini market, bus station, mini cinema , one big post office, one big council office all together in one place					H5 Build to Rent housing	Homes	Reg18-T-088/015	Resident	Reg18-T-088

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-103	Resident	Reg18-T-103/022	Homes	H5 Build to Rent housing						[Add to it] More commitment to these houses	Comment noted. This tenure of housing will be supported in a variety of locations, including on site allocations.
Reg18-T-105	Resident	Reg18-T-105/016	Homes	H5 Build to Rent housing						[Keep it]	Support noted.
Reg18-T-126	Resident	Reg18-T-126/013	Homes	H5 Build to Rent housing						[Keep it]	Support noted.
Reg18-T-063	Student	Reg18-T-063/006	Homes	H5 Build to Rent housing			2 and 3			[Change it] Decreases the amounts in the rents	This policy approach has now changed to reflect our updated affordable housing target in H3. This will help to deliver a greater proportion of built to rent affordable homes at London Affordable Rent levels. Please see the new wording in H5.3.

Reg18-E-102	Unibail-Rodamco-Westfield	Reg18-E-102/012	Homes	H5 Build to Rent housing			3		<p>[There is insufficient recognition within draft Policy H4, or in draft Policy H5 (Build to Rent housing) of the particular character of Build to Rent, which tends to be focussed in more urban, highly accessible locations, which are often less suitable for family housing. The policy should reflect this and ensure there is flexibility for housing mix in covenanted Build to Rent developments.]</p> <p>Draft Policy H5 proposes a requirement that affordable housing is provided with a tenure split of 65% London Affordable Rent (LAR) and 35% London Living Rent. This differs from the approach in London Plan Policy H11, which allows for a wholly intermediate affordable housing offer and includes a fast track route. Delivery of low cost rented tenure homes as part of Build to Rent developments can be challenging, particularly where a constrained site means only a single building with one access core can be delivered. This is because Registered Providers (RPs), who would own and manage the LAR homes, would be unlikely to take on units that are ‘pepper-potted’ within a single building. We acknowledge that a wholly intermediate affordable housing offer could be agreed through a viability exercise, however this would unfairly penalise a Build to Rent developer with a late stage viability review mechanism in circumstances where it is unfeasible to comply with the tenure split requirement for practical reasons. The policy should reflect this and ensure that the London Plan Policy H11 tenure split can be followed in single building Build to Rent developments.</p> <p>[...]</p> <p><u>Recommendation 4: Amend draft Policy H5 to refer to the London Plan Policy H11 tenure split for single building Build to Rent developments, reflecting the challenges of delivering low cost rent units in these circumstances.</u></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we have delivered these tenures on build to rent schemes previously using our adopted development plan. It is considered the issue of management can be dealt with adequately via the provision of separate buildings or management regimes</p>
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Reg18 -E-119	Unite Group plc	Reg18- E- 119/022	Homes	H5 Build to Rent housing			2			<p>Policy H5 'Build to Rent housing'</p> <p>Part 2 of Policy H5 outlines affordable housing requirements for Built to Rent (BTR) developments:</p> <p>2. Developments of Build to Rent housing as a block or phase within a larger development are expected to deliver affordable housing that meets the requirements of Policy H3.</p> <p>Unite make the following comments on this requirement:</p> <ul style="list-style-type: none"> • Policy H5 requires affordable housing from build to rent schemes in line with the draft local plan policy H3 which deals with affordable housing generally. • However, this does not align with The London Plan Policy H11 'Built to Rent' which states that "the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level". This includes provision associated with a block or phase within a development. • No justification is provided for this deviation from The London Plan. <p>Recommendations</p> <p>As a result of the above comments, Unite make the following recommendations in relation to Policy H5:</p> <ul style="list-style-type: none"> • Amendments are necessary to Part 2 to allow for affordable provision in the form of DMR through single core or Payment in Lieu for viability reasons. 	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we have delivered these tenures on build to rent schemes previously using our adopted development plan. It is considered the issue of management can be dealt with adequately via the provision of separate buildings or management regimes</p>
Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/003	Homes	H5 Build to Rent housing						<p>WJG is generally supportive of the approach suggested by draft Policy H5</p>	Support noted.

Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/004	Homes	H5 Build to Rent housing			4		<p>[generally supportive] but raises objection to the “dual viability” approach detailed within part 4 of the draft policy and which states: “Developments of Build to Rent housing that fail to deliver sufficient affordable housing in accordance with the requirements of parts 2 or 3 above are required to submit a detailed financial viability assessment. Developments of Build to Rent housing that are required to submit a detailed financial viability assessment should submit dual viability assessments that incorporate viability testing that set outs outcomes in relation to ‘Build for Rent’ and ‘Build for Sale’ approaches and the subsequent impact upon the delivery of affordable housing. Where it is demonstrated that a Build to Rent approach will deliver less affordable housing in terms of a capital subsidy, a revenue subsidy may be considered as an appropriate alternative”.</p> <p>The suggested approach adds a level of complexity and is not an approach advocated within NPPG, the London Plan or reflected within the planning policies of other local planning authorities.</p> <p>Policy H11 of the London Plan states “viability assessments on such schemes should take account of the differences between Build to Rent and Build to Sale development and be undertaken in line with the Affordable Housing and Viability SPG”. The Affordable Housing and Viability SPG further clarifies that there are distinctly different economic between build to rent and build for sale schemes. The market should decide whether sites are more suitable for a rental or a for sale product.</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as the dual viability assessment allows officers transparently assess and compare scenarios where build for sale homes are delivered on a site instead of build to rent. This policy is a requirement of the adopted Local Plan, and reflects the position set out in the London Plan which requires viability assessments on these schemes to take account of the differences between Build to Rent and Build for Sale development.
Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/005	Homes	H5 Build to Rent housing			4		<p>Build to rent and build for sale schemes are also physically different. For example, build to rent schemes will have a significantly increased provision of amenity space and management</p>	A change to this policy approach has not been made. We did not consider this change to be appropriate as we expect Build for Rent and

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	Build for Sale typologies to meet the same design standards set out in policy.	facilities, and a potentially different mix of units and sizes. In order to assess the viability of a build for sale development, two architectural schemes would need to be designed for the same site, one presenting a build to rent scheme and one presenting a build for sale scheme. This is overly onerous and complex.									
	A change to this policy approach has not been made. We did not consider this change to be necessary as the dual viability assessment allows officers transparently assess and compare scenarios where build for sale homes are delivered on a site instead of build to rent. This policy is a requirement of the adopted Local Plan, and reflects the position set out in the London Plan which requires viability assessments on these schemes to take account of the differences between Build to Rent and Build for Sale development.	Given that the economics and physical characteristics of these two models are different, viability assessments should only be assessed for the relevant model. It is therefore requested that part 4 of the draft policy is replaced with the following: “Developments of Build to Rent housing that fail to deliver sufficient affordable housing in accordance with the requirements of parts 2 or 3 above are required to submit a detailed financial viability assessment”.		4			H5 Build to Rent housing	Homes	Reg18-E-076/006	Watkins Jones Group PLC	Reg18-E-076

Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/021	Homes	H5 Build to Rent housing			4			Policy H5 'Build to Rent' – it generally supports the approach advocated by this policy but raises objection with Part 4 and the “dual viability” approach suggested by the draft Plan.	A change to this policy approach has not been made. We did not consider this change to be necessary as the dual viability assessment allows officers transparently assess and compare scenarios where build for sale homes are delivered on a site instead of build to rent. This policy is a requirement of the adopted Local Plan, and reflects the position set out in the London Plan which requires viability assessments on these schemes to take account of the differences between Build to Rent and Build for Sale development.
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	Support noted.	Build to Rent Housing (Policy H5) ZSUT again support the inclusion of a policy seeking to promote Build to Tent housing within the Borough, subject to the criteria set out within Part 1 of the policy.		1			H5 Build to Rent housing	Homes	Reg18-E-100/048	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation.</p>	<p>Our client has no specific comments on the existing requirements set out within Policy H5, however for the reasons set out within the previous section for Policy H4 (residential mix), it is requested Policy H5 allows for flexibility to the unit mix requirements of Build to Rent due to the nature of this typology of product. Specifically, we consider the policy should allow for the inclusion of studio units, and a proportion of 1-bed 2-person units higher than the 15% currently restricted in Policy H4.</p>					H5 Build to Rent housing	Homes	Reg18-E-100/049	Zirconia Stratford Unit Trust	Reg18-E-100

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	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation.</p>						H5 Build to Rent housing	Homes	Reg18-E-100/050	Zirconia Stratford Unit Trust	Reg18-E-100

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	<p>This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Policy H4 now also includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Please see the new wording in policy H4.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Newham's Strategic Housing Market Assessment took into consideration the population demographics of the borough when determining housing need. The Strategic Housing Market Assessment evidence base accordingly breaks down need based on bedroom-size, and demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes.</p> <p>Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation.</p>						H5 Build to Rent housing	Homes	Reg18-E-100/055	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to provide additional clarification on the types of housing for older people covered by policies H6 and H7. Please see the new wording in Policy H7's implementation text.	<p>It is not clear which types of housing for older people (as defined by Planning Practice Guidance) would be determined against Policy H6.</p> <p>The different types of housing for older people reflect their diverse needs and include age-restricted general market housing and sheltered housing, as well as extra care and residential care homes. While extra care and residential care homes are likely to be occupied by people with at least some care needs, and may require the involvement of the local commissioning team, age-restricted housing and sheltered housing is often occupied by people without any care needs or vulnerabilities and would not have the involvement of a commissioning team.</p> <p>Anchor's Stanley Holloway Court is an example of such a scheme. As Policy H6 refers to "vulnerable people", "people with care needs" and refers throughout to commissioning teams, it is unclear whether the policy would only apply to extra care and residential homes or all types of housing for older people. The policy as currently worded is too ambiguous to be effective.</p>		1			H6 Supported and specialist housing	Homes	Reg18-E-050/009	Anchor	Reg18-E-050

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to include an additional option for the release of specialist accommodation. This involves accommodation being offered to commissioning teams. If commissioning teams consider the existing accommodation provision is not needed locally, then accommodation can be lost to other residential uses. Please see the new wording in Local Plan policy H6. For clarity, H6.1.a would allow for the delivery of off-site replacement specialist accommodation, recognising not all sites may be able to deliver alternative accommodation on-site.	The requirements of Criterion 1 are likely to prevent the replacement of accommodation for older people with higher quality developments, where required. In the case of age-restricted or sheltered accommodation, it is unlikely that a commissioning team will have any involvement in the scheme and therefore won't be able to comment on the quality of the provision as required under Criterion 1b. This will result in applicants relying on Criterion 1a. However, this requires replacement accommodation to be "available" which would prevent redevelopment unless there was space to construct a new building before demolishing an existing one. This scenario is unlikely to arise and therefore this part of the policy is ineffective and will impact on the delivery of housing for older people. A more flexible approach is required.		1			H6 Supported and specialist housing	Homes	Reg18-E-050/010	Anchor	Reg18-E-050
	This policy approach has now changed to clarify those forms of accommodation for older residents that are most needed in Newham. Please see the new wording Policy H7. The change you have suggested has not resulted in a change as we did not consider this change to be appropriate for the reasons set out in the 'Accommodation for older residents' topic paper, which discusses in detail the need for different forms of accommodation for older people in the borough.	Criterion 2 requires development to be high quality, in an appropriate location and for the need to be evidenced. The 2022 SHMA identifies a need for 2,804 sheltered homes and 1,295 extra care homes by 2038 and highlights that this is "likely to be unachievable". We would therefore question the requirement within the policy to evidence need for older persons' housing, given that the needs of older people are unlikely to be met across the plan period. Furthermore, the policy should provide clarity around the definition of an 'appropriate location' to ensure that the policy is effective.		2			H6 Supported and specialist housing	Homes	Reg18-E-050/011	Anchor	Reg18-E-050

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-050	Anchor	Reg18-E-050/012	Homes	H6 Supported and specialist housing			3			Criterion 3 also requires accommodation for people with care needs to be evidenced through engagement with commissioning teams. As highlighted above, it is not clear whether this requirement would also apply to types of housing for older people which would not be commissioned but, in any event, in the context of the scale of need identified in the SHMA it is not justified.	This policy approach has now changed to clarify those forms of accommodation for older residents that are most needed in Newham. Please see the new wording Policy H7. The change you have suggested has not resulted in a change as we did not consider this change to be appropriate for the reasons set out in the 'Accommodation for older residents' topic paper, which discusses in detail the need for different forms of accommodation for older people in the borough.
Reg18-E-050	Anchor	Reg18-E-050/013	Homes	H6 Supported and specialist housing			4			Criterion 4 requires 67% of residents to be, on average, existing Newham residents. Although sheltered housing for older people is specifically excluded, the occupancy restriction would presumably still be applied to age-restricted general market housing and extra care, although clarity should be provided to ensure that the policy is effective. There is, however, no evidence provided to justify a local occupancy restriction and the policy will be ineffective without a definition of "on average".	This policy approach has now changed to clarify that policies H6 and H7 do not apply to age-restricted general market homes, which should be assessed against policy requirements for general needs housing. Please see the new wording Policy H7. The change you have suggested has not resulted in a change as we did not consider this change to be appropriate for the reasons set out in the 'Accommodation for older residents' topic paper, which discusses the rationale behind the local occupancy requirement in the policy.
Reg18-E-070	Aston Mansfield	Reg18-E-070/075	Homes	H6 Supported and specialist housing						f. H6: Supported and Specialist Housing - Would you keep, change or add something to this policy? No comment	Comment noted.
Reg18-S-002	Homeless forum	Reg18-S-002/003	Homes	H6 Supported and specialist housing						Specialist and supported housing delivery bodies need access to capital funding and the plan should be driving this	A change to this policy approach has not been made. We did not consider this change to be necessary as we have worked with relevant commissioning teams within the Council to ensure the plan policies align with their needs and best practice.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. It is anticipated Policy H6 will help work alongside the supported accommodation Dynamic Purchase Vehicle (DPV), both of which will help to ensure the quality of new supported accommodation being delivered in the borough.	Support flexibility for the location of supported housing. There is a supported housing strategy helping to drive the delivery of Adult Social Care.		2.b			H6 Supported and specialist housing	Homes	Reg18-S-002/004	Homelessness forum	Reg18-S-002
	A change to this policy approach has not been made. We did not consider this change to be necessary as we have worked with the NHS to ensure the plan policies align with their needs and best practice. We have also worked with colleagues in Adult Social Care to ensure new developments delivering sheltered housing will be of a high quality and appropriately located. Please see the new wording in policies H6 and H7.	Need to work with NHS estates to ensure the delivery of Sheltered Housing.		3			H6 Supported and specialist housing	Homes	Reg18-S-002/005	Homelessness forum	Reg18-S-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	I know homelessness isn't just a Newham problem or a London problem - but much more work needs to happen to get people in homes. It's so awful, and the government doesn't help. [A:2] [originally submitted in response to 1.12 in the Introduction]					1.12	H6 Supported and specialist housing		Reg18-K-003/004	Resident	Reg18-K-003
	<p>The policy approach in Policy H2 has now changed to clarify the circumstances under which family homes can be converted for a temporary period to a House in Multiple Occupation for the sole use by Newham's Homelessness service for single homeless residents or for people who are owed a homelessness duty. The policy approach was originally introduced under the Regulation 18 Local Plan to help address the significant number of people in temporary accommodation in the borough. Please see the new wording in policy H2. Policy H6 also sets out policy requirements relevant to the provision of more specialist and supported forms of accommodation for homeless people and rough sleepers. The location and quality of these forms of housing should be informed in discussion with relevant commissioning teams in the Council.</p> <p>Separate to the Local Plan, our colleagues in the Adults and Health and Housing directorates in the Council work with residents who are, or are at risk of, rough sleeping or homelessness, including through our Homelessness Prevention and Advice Service (HPAS). Newham also has a published Homelessness and Rough Sleeping Strategy 2021-2026, which sets out an intelligence-led, public health approach to tackling homelessness, and improving access to, and the quality of, housing within the borough.</p>						H6 Supported and	Homes	Reg18-T-011/006	Resident	Reg18-T-011

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							specialist housing				
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it] Need more transparency					H6 Supported and specialist housing	Homes	Reg18-T-019/014	Resident	Reg18-T-019
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan includes requirements for the provision of accessible and adaptable dwellings under policy H11.	[Add to it] New developments and local areas should have provision for people with a range of mobility and other support needs.					H6 Supported and specialist housing	Homes	Reg18-T-034/035	Resident	Reg18-T-034
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Change it] 2					H6 Supported and specialist housing	Homes	Reg18-T-057/032	Resident	Reg18-T-057
	A change to this policy approach has not been made. We did not consider this change to be appropriate as specialist accommodation placements are made by the Council's Adult Social Care services. However, the Local Plan does direct new specialist accommodation to accessible locations. The implementation text for policy H6 sets out that typically specialist or supported accommodation should be directed to locations that are accessible to Town and/or Local Centres and relevant supporting facilities. This will mean accommodation is accessible to public transport so that relatives can visit. The policy does acknowledge there may be some instances proximity to Town Centres may be inappropriate. This could be because of	[Change it] Yes, nursing home or supported housing scheme should be near to their relatives or siblings.		2.b			H6 Supported and specialist housing	Homes	Reg18-T-088/016	Resident	Reg18-T-088

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	safeguarding risks or distancing from potential health trigger. Most importantly, appropriate locations should be determined in consultation with relevant commissioning teams within the Council.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H6 sets out the circumstances under which new specialist homes will be supported. These requirements seek to ensure new specialist and supported homes are good quality, meet need and are provided in suitable locations.	[Keep it] Need more special needs housing					H6 Supported and specialist housing	Homes	Reg18-T-102/005	Resident	Reg18-T-102
	Support noted.	[Keep it]					H6 Supported and specialist housing	Homes	Reg18-T-105/017	Resident	Reg18-T-105

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-108	Resident	Reg18-T-108/008	Homes	H6 Supported and specialist housing						[Add to it] Vulnerable people with Mental Health issues need to be in a safer environment	A change to this policy approach has not been made. We did not consider this change to be necessary as improving safety and feelings of safety is addressed through a range of policies in the Local Plan including design policies, high street policies, green and water spaces policies and through the neighbourhood policies. Policy H6 also sets out the circumstances under which new specialist homes will be supported. These requirements seek to ensure new specialist and supported homes are good quality, meet need and are provided in suitable locations.
Reg18-T-126	Resident	Reg18-T-126/014	Homes	H6 Supported and specialist housing						[Keep it]	Support noted.
Reg18-E-050	Anchor	Reg18-E-050/014	Homes	H7 Housing for older people						Anchor supports the inclusion of a policy which supports housing specifically for older people, although we question its effectiveness and consistency with national policy.	Comment noted.
Reg18-E-050	Anchor	Reg18-E-050/015 b	Homes	H7 Housing for older people			1.d			The requirement for developments to provide publicly accessible community facilities or main town centre uses is also not justified. While some facilities may be provided for residents, this depends on the type of housing proposed and in many situations such a requirement would compromise the viability of a development. This requirement should be removed from Policy H7 to ensure that it is effective.	This policy approach has now changed to clarify that the provision of community facilities in developments for older residents is encouraged, rather than compulsory to deliver. Please see the new wording in Policy H7.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to except care home accommodation from this requirement, and remove the requirement for accommodation to be located on major roads. Please see the new wording in Policy H7. The change you have suggested has not resulted in a change as we did not consider this change to be appropriate for the reasons set out within the 'Specialist housing for older people' topic paper.	Criterion B requires housing for older people to be location within town centres or on sections of major roads within 400m of a local centre / 800m of a town centre unless specific care needs and/or vulnerabilities justify an alternative location which is evidenced through early engagement with a commissioning team. [...] Furthermore, housing for older people is not a “main town centre use” as defined in the NPPF and therefore there should be no requirement for proposals to be located within town centres, or equally on a “section of major road” or within specific distances of defined centres. Restricting housing for older people to such locations will limit the number of suitable sites and exacerbate the shortage of housing for older people. To be effective, and accord with national policy, the policy should be more flexible and support all types of housing for older people providing the proposal accords with other policies of the local plan. A requirement for the housing to be in accessible locations, which could include being close to shops and services or public transport, could be introduced.		1.b			H7 Housing for older people	Homes	Reg18-E-050/016	Anchor	Reg18-E-050

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18 -E-050	Anchor	Reg18- E- 050/015 a	Homes	H7 Housing for older people			1.a			<p>Criterion D goes on to require proposals for older persons housing to include community facilities or town centre uses which are publicly accessible and requires the support for the development from a commissioning team.</p> <p>As highlighted in our response to Policy H6, older people have a diverse range of needs and not all are vulnerable or require care. Additionally, there are a broad range of types of housing for older people identified within Planning Practice Guidance and not all are commissioned by a local authority (age-restricted housing, retirement living etc.).</p> <p>Proposals for age-restricted and retirement living housing should not require the support of a commissioning team, who would not commission these developments. The 2022 SHMA identifies a clear need for sheltered and extra care housing for older people. The proposed policy requirement is likely to frustrate the development process and could stall sites which are otherwise capable of meeting the needs of older people. [...]</p>	The wording of Policy H7 has now changed to further clarify those forms of specialist accommodation for older people needed in the borough. It also sets out that policies H6 and H7 apply to those forms of older-persons housing where care is provided (sheltered housing, extra care and care homes). Age-restricted general market housing should be assessed against policy requirements applied to general needs housing, including affordable housing and housing mix requirements. Please see the new wording in Policy H7. The change you have suggested has not resulted in a change as we did not consider this change to be appropriate for the reasons set out within the 'Specialist housing for older people' topic paper.
Reg18 -E-070	Aston Mansfield	Reg18- E- 070/076	Homes	H7 Housing for older people						<p>g. H7: Housing for Older People - Would you keep, change or add something to this policy?</p> <p>No comment</p>	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-037	Resident	Reg18-K-037/006b	Homes	H7 Housing for older people				3.137		More needs to done to provide [good quality affordable rental accommodation for all. First time renters, as well as first time buyers] in addition to assisted living accommodation for older personnel [Originally submitted on Para 3.137 of H1]	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy supports the delivery of older persons accommodation where aligned with local need.
Reg18-T-011	Resident	Reg18-T-011/007	Homes	H7 Housing for older people						[Keep it]	Support noted.
Reg18-T-019	Resident	Reg18-T-019/015	Homes	H7 Housing for older people						[Add to it] Need more transparency	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-034	Resident	Reg18-T-034/036	Homes	H7 Housing for older people						[Add to it] New developments and local areas should have provision for people with a range of mobility and other support needs.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan includes requirements for the provision of accessible and adaptable dwellings under policy H11.
Reg18-T-057	Resident	Reg18-T-057/033	Homes	H7 Housing for older people						[Keep it] E	Support noted.
Reg18-T-074	Resident	Reg18-T-074/009	Homes	H7 Housing for older people						[Keep it] Small and accessible dwelling	A change to this policy approach has not been made. We did not consider this change to be necessary as relevant quality standards for accommodation for older people are set out in policy H11.
Reg18-T-074	Resident	Reg18-T-074/010	Homes	H7 Housing for older people						[Keep it] [Small and accessible dwelling] that not difficult to manger.	A change to this policy approach has not been made. We did not consider this change to be necessary as relevant quality standards for accommodation for older people are set out in policy H11.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-086	Resident	Reg18-T-086/007	Homes	H7 Housing for older people						[Change it] More	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy supports the delivery of older persons accommodation where aligned with local need.
Reg18-T-088	Resident	Reg18-T-088/017	Homes	H7 Housing for older people						[Change it] very very important, I seen with my eyes, older people with disability still living in council houses in very poor condition, they can't even walk normally and they have no lift in the buildings, i raised my voices many times through surveys but unfortunately these all surveys are only fill up the filespractically ZERO	<p>Comment noted. In order to address these issues we have proposed a new portfolio approach to delivering wheelchair adaptable or adapted homes in Policy H11 (Housing Design Quality).</p> <p>It is recognised that in some instances, for example areas of high flood risk, site constraints may preclude wheelchair adapted accommodation being delivered on the ground floor of a development and it may be too expensive for smaller developments to include and maintain a lift. Accordingly, the policy allows for the delivery of a portfolio approach in limited circumstances to help address this issue, in essence allowing for increased delivery of accessible homes (on the ground floor or with lifts) on some sites to make up for lower provision of accessible homes on another, less suitable sites.</p>
Reg18-T-105	Resident	Reg18-T-105/018	Homes	H7 Housing for older people						[Keep it]	Support noted.
Reg18-T-108	Resident	Reg18-T-108/009	Homes	H7 Housing for older people						[Add to it] OVER 50 & VULNERABLE AND THE ELDERLY	A change to this policy approach has not been made. We did not consider this change to be necessary as a definition of Housing for older people is provided in the glossary for the Local Plan, which includes residents over the age of 50.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-126	Resident	Reg18-T-126/015	Homes	H7 Housing for older people						[Keep it]	Support noted.
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/100	Homes	H7 Housing for older people						Impact of service charge on older residents - willingness to live in flats. Can't afford the service charge. Have to leave the borough to find a freehold bungalow	The policy approach set out in Policy H11 (Housing design quality) has now changed to clarify that affordable housing should be of equivalent quality to private accommodation and should not result in a significant increase in the cost of tenants of affordable housing's service charges. Please see the new wording in Policy H11.
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/184	Homes	H7 Housing for older people						Encouragement to developers to build bungalows so old people remain in E15	A change to this policy approach has not been made. We did not consider this change to be appropriate as bungalows are not of sufficient density to help deliver Newham's significant housing target.
Reg18-E-070	Aston Mansfield	Reg18-E-070/077	Homes	H8 Purpose-built student accommodation						h. H8: Purpose-built Student Accommodation - Would you keep, change or add something to this policy? No comment	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>	<p>It also proposes that the site should be identified as a suitable location for purpose-built student accommodation, which reflects the suitability of this use in Stratford Town Centre, as identified in Policy H.4: Providing student accommodation in the LLDC Local Plan (see our comments on Policy H8 below) and London Plan Policy H15: Purpose-built student accommodation (part b) which sets out that Boroughs are encouraged to develop student accommodation in locations will connected to local services by walking, cycling and public transport as part of mixed use regeneration and redevelopment schemes.</p>		1.c		N8.SA 5 Stratford Town Centre West	H8 Purpose-built student accommodation	Homes	Reg18-E-130/028	Hadley Property Group	Reg18-E-130

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>	<p>Whilst Hadley supports the requirement for new PBSA to be located in a Town Centre location with a minimum PTAL 4, it is wholly inappropriate to limit the provision on new PBSA in the Stratford and Maryland neighbourhood if it is solely providing a replacement facility with no net increase in bed spaces.</p>		1.c			H8 Purpose-built student accommodation	Homes	Reg18-E-130/124	Hadley Property Group	Reg18-E-130

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>	<p>As clearly stated in Policy H.4: Providing student accommodation of the LLDC Local Plan, provision of PBSA should “be directed to appropriate locations within or on the edge of the Metropolitan Centre”.</p> <p>Stratford Town Centre is the most sustainable location for PBSA in the borough, so the DLP should not seek to prevent the provision of new PBSA in the neighbourhood.</p>		1.c			H8 Purpose-built student accommodation	Homes	Reg18-E-130/125	Hadley Property Group	Reg18-E-130
	<p>This policy approach has now changed to only require nominations agreements with higher education providers with a campus based in Newham where accommodation is in an area of over-saturation of purpose built student housing delivery and it is located within or adjacent to an existing campus. This will prevent further over-concentration of student bed spaces. Please see the new wording in Policy H8.</p>	<p>Hadley also objects to the requirement for nominations agreements with higher education providers with a campus based in Newham.</p> <p>This approach is inconsistent with Policy H15: Purpose-built student accommodation of the London Plan and does not reflect the sustainability and accessibility of Newham’s town centres as suitable locations for London’s students to live in.</p>		3			H8 Purpose-built student accommodation	Homes	Reg18-E-130/127	Hadley Property Group	Reg18-E-130

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>	<p>Homes</p> <p>Policy H8 seeks to restrict new student accommodation provision in the Stratford and Maryland area, however this is likely to become the location of new or expanded campuses including UCL East. The policy may inadvertently displace provision into less accessible locations within Newham and adjoining boroughs. Therefore, the policy should allow for additional student accommodation in the areas close to the campus and where it is close to the location of the additional HE student capacity being created.</p>		1.c			H8 Purpose-built student accommodation	Homes	Reg18-E-135/007	London Borough of Redbridge	Reg18-E-135
	Support noted.	The overall approach in the policy is welcomed and is in general consistent with the approach in the LLDC Local Plan.					H8 Purpose-built student accommodation	Homes	Reg18-E-052/110	London Legacy Development Corporation	Reg18-E-052

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/111	Homes	H8 Purpose-built student accommodation			1.c			<p>However, there are some aspects that are worth further consideration. The LLDC area has seen a number of proposals for purpose-built student accommodation, in part driven by the arrival of a number of higher education providers within the East Bank cultural and education hub and at Here East. As drafted, the policy identifies Stratford and Maryland Neighbourhood as only being appropriate for such development where there is no net gain in bed spaces. However, this is the area in which the new Higher Education Providers are based and also includes the Stratford Metropolitan Centre. The LLDC Local Plan directs PBSA development towards the Metropolitan Centre. In order to be able to meet the genuine locally derived student housing need, it may be more appropriate to locations in and around the Metropolitan Centre where this would not prejudice the delivery of C3 housing and a clear link to a locally based higher education provider has been demonstrated and can be secured.</p>	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				1			H8 Purpose-built student accommodation	Homes	Reg18-E-082/044 a	Resident	Reg18-E-082
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>										
	<p>Contributions should be sought for affordable housing and healthcare (unless healthcare is provided onsite).</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as affordable housing requirements are set out within policy H8. Wider need for healthcare facilities in the borough is considered and planned for in separate policies, namely Building a Fairer Newham, Community Facilities and Neighbourhood policies.</p>			2 and 4			H8 Purpose-built student accommodation	Homes	Reg18-E-082/044 b	Resident	Reg18-E-082

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>	Student accommodation should be limited to those areas with existing campuses such as in Stratford and the Dock areas.		1			H8 Purpose-built student accommodation	Homes	Reg18-E-082/044c	Resident	Reg18-E-082

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	[Keep it]					H8 Purpose-built student accommodation	Homes	Reg18-T-011/008	Resident	Reg18-T-011
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it] Need more transparency					H8 Purpose-built student accommodation	Homes	Reg18-T-019/016	Resident	Reg18-T-019

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/037	Homes	H8 Purpose-built student accommodation			1			[Add to it] I'm concerned about the number of student blocks. There should be priority on good quality, secure, long-term housing for residents over student accommodation.	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>
Reg18-T-057	Resident	Reg18-T-057/034	Homes	H8 Purpose-built student accommodation						[Add to it] W	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-088	Resident	Reg18-T-088/018	Homes	H8 Purpose-built student accommodation						[Keep it] less burden on him, need privacy for there education	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	[Keep it]					H8 Purpose-built student accommodation	Homes	Reg18-T-105/019	Resident	Reg18-T-105
	Support noted.	[Keep it]					H8 Purpose-built student accommodation	Homes	Reg18-T-126/016	Resident	Reg18-T-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has been made. Please see the new wording in Policy H8.	The Berkeley Group supports the acknowledgement of need for student housing in certain locations in Newham. The London Plan sets an overall strategic requirement for PBSA of 3,500 bed spaces across London per year. Moreover, there are strong academic clusters in Newham, and on the edge of its boundaries, including at Stratford and around the East India DLR Station. The London Plan (Policy H15) encourages the development of student housing in locations that are well-connected to local services by public transport and active travel, particularly in mixed-use regeneration and redevelopment schemes. As the use of town centre is unclear in the Draft Local Plan, we suggest that Point 1 part b is clarified to include Local Centres. It is considered that Local Centres with a PTAL of at least 4 will be well-connected to services and therefore appropriate for student housing use, in line with London Plan Policy H15. Proposed wording change: 1. New purpose-built student accommodation will only be supported where: a. it is located within or adjacent to an existing campus development in the borough; or b. it is in a Town Centre (<u>International, Metropolitan, Major, District or Local Centre</u>) location well connected by public transport (with a minimum Public Transport Accessibility Level of 4);		1			H8 Purpose-built student accommodation	Homes	Reg18-E-136/117	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>			1			H8 Purpose-built student accommodation	Homes	Reg18-As-001/106	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>			1.c			H8 Purpose-built student accommodation	Homes	Reg18-As-001/112	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				1			H8 Purpose-built student accommodation	Homes	Reg18-As-001/145	Stratford and West Ham Assembly	Reg18-As-001
	<p>[Change] Student housing - balance with permanent housing for Newham residents</p> <p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>										
	<p>[Change] Student housing needs to be affordable</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H8 includes requirements for Purpose-built student accommodation to deliver affordable student accommodation.</p>			2			H8 Purpose-built student accommodation	Homes	Reg18-As-001/148	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>	[Add] Cumulative impact assessment for student accommodation?		1			H8 Purpose-built student accommodation	Homes	Reg18-As-001/158	Stratford and West Ham Assembly	Reg18-As-001

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/164	Homes	H8 Purpose-built student accommodation			1.c			[Change] Allocating student accommodation put it in the right place - as East Village may not be the right place - Stratford Station maybe better	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>
Reg18-As-001	Stratford and West Ham Assembly	Reg18-As-001/166	Homes	H8 Purpose-built student accommodation			2			[Add] Have more affordable student accommodation	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H8 includes requirements for Purpose-built student accommodation to deliver affordable student accommodation.
Reg18-T-063	Student	Reg18-T-063/007	Homes	H8 Purpose-built student accommodation						[Keep it]	Support noted.

Reg18 -E-119	Unite Group plc	Reg18- E- 119/002	Homes	H8 Purpose- built student accommo dation			1		<p>Policy H8 'Purpose-built student accommodation'</p> <p>Part 1 of Policy H8 seeks to only support student accommodation where:</p> <p>a) It is located within or adjacent to an existing campus development in the borough; or</p> <p>b) It is in a Town Centre Location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); or</p> <p>c) In the Stratford and Maryland neighbourhood, it is solely providing a replacement facility with no net increase in bed spaces</p> <p>The supporting text justifies this policy, stating the need to regulate student accommodation, particularly in the Stratford and Maryland neighbourhood, to avoid undermining the delivery of general needs housing.</p> <p>Unite make the following comments in response to the policy seeking to limit the development of student accommodation to certain locations:</p> <ul style="list-style-type: none"> • The policy will significantly limit the development of purpose built student accommodation (PBSA), contrary to The London Plan (2021) Policy H15 'Purpose-built student accommodation', which encourages the development of student accommodation. There are no locational constraints advised in the NPPF or the London Plan. 	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>
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Reg18-E-119	Unite Group plc	Reg18-E-119/003	Homes	H8 Purpose-built student accommodation			1		<p>Student Housing holds the potential to contribute to the housing supply and free up conventional, 'general needs' housing, as recognised in paragraph 4.15.1 of The London Plan Policy H15's supporting text.</p> <ul style="list-style-type: none"> Paragraph 4.15.2 of the supporting text associated with Policy H15 of The London Plan sets out requirements for 3,500 PBSA bedspaces annually. LB Newham's Strategic Housing Market Assessment (SHMA 2022) estimates that 6% of London's students reside in Newham. Using figure of 6%, the SHMA then works out that this would equate to 210 of the 3,500 bedspaces to be provided annually. The SHMA states that Higher Education Providers are locating new campuses in Newham around the Olympic Park including: <ul style="list-style-type: none"> Up to 4,000 students at UCL East with many arriving in 2022 and 2023. Some or all of the 5,000 students at the London College of Fashion relocating in 2023. Loughborough University London students. Staffordshire University London students. Whilst not all of these students may reside in Newham, they will still significantly increase the student population. The SHMA estimates there will be approximately a 60% increase in the number of students. The above points show that demand for PBSA is due to increase in Newham over the upcoming years. Therefore, locational limits on student accommodation development may fail to meet demand. This may result in students living in the private rented sector increasing strain on the local housing market. The SHMA states that the number of private households comprising only of students has already nearly doubled from 475 in 2011 to 917 in 2022. Consequently, without PBSA, the availability of 	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p> <p>Regarding the provision of purpose-built student accommodation freeing up private rented sector housing, the comment you have provided has not resulted in a change as we did not consider this change to be appropriate given that Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation.</p>
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										general needs housing will decline, placing further pressure on the borough's housing stock.	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/005	Homes	H8 Purpose-built student accommodation			1.c			<ul style="list-style-type: none"> The Stratford and Maryland neighbourhood in particular provides excellent public transport connections with large proportions of the neighbourhood having PTAL ratings of 6a and 6b. This provides excellent locations for student accommodation. As such, the most need for PBSA is within this neighbourhood and placing a restriction on this area would result in unsustainable development. 	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>

Reg18 -E-119	Unite Group plc	Reg18- E- 119/006	Homes	H8 Purpose- built student accommo- dation			2		<p>Part 2 of the policy seeks affordable housing from student developments:</p> <p>2. New purpose-built student accommodation should provide at least 35 per cent affordable housing as defined within the London Plan (2021), or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with London Plan (2021) Policy E7 and Local Plan Policy J3.</p> <p>Whilst it is recognised the principle of the policy largely aligns with The London Plan Policy H15, Unite comment that:</p> <ul style="list-style-type: none"> • The wording of the policy differs from The London Plan as per Paragraph 4.15.8 of Policy H15's supporting text which clearly defines affordable student accommodation as "a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year". • However, Newham's draft policy refers to affordable housing as opposed to affordable student rent, and this should be clarified and amended to accord with Policy H15 of the London Plan. • This is important to address any confusion in relation to the provision of different forms of affordable housing which have their own layout and cost requirements. 	<p>This wording change has been made. Please see the new wording in Policy H8, which now reflects the terminology used in the London Plan.</p>
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Reg18-E-119	Unite Group plc	Reg18-E-119/007	Homes	H8 Purpose-built student accommodation			3		<p>Part 3 of the policy requires PBSA development to secure a nomination agreement:</p> <p>3. New purpose-built student accommodation should secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers with a campus based in Newham. The nominations agreement should be agreed prior the commencement of above ground works. Unite make the following comments in relation to the requirement for this higher education provider to be located within Newham:</p> <ul style="list-style-type: none"> • It is unclear why the policy seeks a nomination with one or more higher education provider in Newham. The borough is well-located and well-connected, particularly in Stratford (International Train Station and highly used domestic station with underground and overground facilities) and towards other neighbouring boroughs such as London Borough of Hackney. • Furthermore, this requirement directly contradicts paragraph 4.15.3 of The London Plan, which states that “There is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed”. • No justification is provided for this departure from The London Plan either within the policy itself or within the policy’s supporting text. • Indeed, it is notable that the draft Westminster City Plan original contained a similar policy clause, with policy 11 stating at point G that PBSA would only be supported “for students studying at higher education institutions with a main hub in Westminster”. Following Unite’s participation at the Examination in Public (EIP) for this plan, the Inspector’s recommended this sentence be removed in its entirety in order for the policy to be found acceptable. It is argued 	<p>This policy approach has now changed to only require nominations agreements with higher education providers with a campus based in Newham where accommodation is in an area of over-saturation of purpose built student housing delivery and it is located within or adjacent to an existing campus. This will prevent further over-concentration of student bed spaces. Please see the new wording in Policy H8.</p>
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										the same conclusion must be reached in this instance.	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/008	Homes	H8 Purpose-built student accommodation			4			<p>Part 4 of the policy requires the provision of small-scale community facilities:</p> <p>4. Developments delivering purpose-built student accommodation should provide small-scale community facilities that meet the needs of the student population within a development unless they are located within 1,200 metres of existing student facilities that have sufficient capacity to meet increased need.</p> <p>Unite make the following comments in relation to this part of the policy:</p> <ul style="list-style-type: none"> • There is no justification provided for the requirement of community facilities or for the 1,200m locational restriction that dictates which developments need to provide these facilities. • Amending the policy to seek student amenity space as opposed to community facilities, which may also result in a separate planning unit, would be more suitable whilst still ensuring that the needs of students are met within the development. 	<p>This policy approach has now changed to reflect that the objective of this policy primarily relates to relieving pressures on local public spaces for study (such as libraries and gyms). The implementation text now clarifies the 1200m distance reflects the need to support the delivery of 15-minute neighbourhoods. Please see the new wording in Policy H8 (Purpose-built student accommodation).</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/009	Homes	H8 Purpose-built student accommodation			1			<p>Recommendations: Unite therefore make the following recommendations regarding draft Policy H8:</p> <ul style="list-style-type: none"> • The locational limit on the development of student housing is removed in order to align with London Plan Policy and where demand for PBSA lies. 	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>
Reg18-E-119	Unite Group plc	Reg18-E-119/010	Homes	H8 Purpose-built student accommodation			2			<p>[Recommendations: Unite therefore make the following recommendations regarding draft Policy H8:]</p> <ul style="list-style-type: none"> • The wording of Parts 2 is changed to clarify that this refers to affordable student rent as opposed to affordable housing to match London Plan policy. 	<p>This wording change has been made. Please see the new wording in Policy H8, which now reflects the terminology used in the London Plan.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				3			H8 Purpose-built student accommodation	Homes	Reg18-E-119/011	Unite Group plc	Reg18-E-119
	This policy approach has now changed to only require nominations agreements with higher education providers with a campus based in Newham in the Stratford and Maryland neighbourhood. This requirement remains in Stratford and Maryland given the very high levels of student bed spaces that have been permitted in this neighbourhood. To prevent further over-concentration of student bed spaces in this neighbourhood, additional policy limitations apply in Stratford and Maryland around the delivery of new student accommodation. The exception to this is where accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough. Please see the new wording in Policy H8.										
				4			H8 Purpose-built student accommodation	Homes	Reg18-E-119/012	Unite Group plc	Reg18-E-119
	This policy approach has now changed to reflect that the objective of this policy primarily relates to relieving pressures on local public spaces for study (such as libraries and gyms). The implementation text now clarifies the 1200m distance reflects the need to support the delivery of 15-minute neighbourhoods. Please see the new wording in Policy H8 (Purpose-built student accommodation).										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/014	Homes	H8 Purpose-built student accommodation			1			<ul style="list-style-type: none"> PBSA is a form of housing. National guidance in fact states that “all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority’s housing land supply” (NPPG, Paragraph: 034 Reference ID: 68-034-20190722). In addition, the NPPG also states that “encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock” (Paragraph: 004 Reference ID: 67-00420190722). Given PBSA is a recognised form of housing, it is not considered sound to unduly restrict concentrations of this form of housing specifically. [Original comment submitted on H9] 	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>
Reg18-E-119	Unite Group plc	Reg18-E-119/016	Homes	H8 Purpose-built student accommodation						<ul style="list-style-type: none"> In addition, all Unite properties are supported by student management plans which ensures 24 security and effective management of future occupiers which represents more control of tenants, compared to HMOs. 	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	UCL welcome in draft Policy H8 the recognition that the N8 Stratford and Maryland neighbourhood has been the focus point of the majority of pipeline and delivered student accommodation in recent years. Under the Outline Consent (LLDC ref. 17/00235/OUT), UCL East is set to contribute up to 50,880 sqm of student accommodation floorspace to this neighbourhood. 552 rooms are already found at One Pool Street.	3.15 3				H8 Purpose-built student accommodation	Homes	Reg18-E-054/009	University College London	Reg18-E-054

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>	<p>Draft Policy H8 states that new purpose-built student accommodation will be supported in a Town Centre location, but that “new purpose-built student accommodation will only be supported ...in the Stratford and Maryland neighbourhood [where] it is solely providing a replacement facility with no net increase in bed spaces”.</p> <p>The comparable adopted LLDC policy for draft Policy H8 is Policy H.4 ‘Providing student accommodation’, which is more supportive of student accommodation and welcomes student accommodation development where it is “directed to appropriate locations within or on the edge of the Metropolitan Centre”, including Stratford It is noted that that “proposals outside these locations will be acceptable where they are suitably located for easy access by walking, cycling or public transport to the higher education provider/s to which the proposal is linked”.</p> <p>UCL do not consider it appropriate to prevent additional purpose-built student accommodation in the Stratford and Maryland neighbourhood in cases where this does not reprovide an existing facility, and that instead such proposals should be subjected to the usual development tests. It is also considered that this restriction is inconsistent with the remainder of the policy which supports purpose-built student accommodation in Town Centre locations.</p>		1.c			H8 Purpose-built student accommodation	Homes	Reg18-E-054/010	University College London	Reg18-E-054

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				3			H8 Purpose-built student accommodation	Homes	Reg18-E-054/011	University College London	Reg18-E-054
	Furthermore, UCL object to the requirement for purpose-built student rooms to be secured through a nomination agreement with a Newham-based higher education provider, as this is considered overly restrictive.										
	This policy approach has now changed to only require nominations agreements with higher education providers with a campus based in Newham where accommodation is in an area of over-saturation of purpose built student housing delivery and it is located within or adjacent to an existing campus. This will prevent further over-concentration of student bed spaces. Please see the new wording in Policy H8.										
				1.a			H8 Purpose-built student accommodation	Homes	Reg18-E-117/006	University of East London	Reg18-E-117
	Policy H8: Purpose-built student accommodation Our client is broadly supportive of the overarching principles of Draft Policy H8, specifically in relation to directing new purpose-built student accommodation within or adjacent to an existing campus development in the borough. This is consistent with UEL's proposals for the Stratford Campus, which seek to deliver on-campus student accommodation to support the sustainable growth of the campus.										
	Support noted.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>	<p>WJG comments upon draft Policy H8 and raises concerns with the following elements:</p> <ul style="list-style-type: none">· Part 1 of the draft policy which restricts PBSA to locations: within or adjacent to campus development; in a town centre location with a PTAL rating of four or above; and in the Stratford and Maryland neighbourhood, providing it is a replacement facility with no increase in bedspaces		1			H8 Purpose-built student accommodation	Homes	Reg18-E-076/007 a	Watkins Jones Group PLC	Reg18-E-076
	<p>This policy approach has now changed to only require nominations agreements with higher education providers with a campus based in Newham where accommodation is in an area of over-saturation of purpose built student housing delivery and it is located within or adjacent to an existing campus. This will prevent further over-concentration of student bed spaces. Please see the new wording in Policy H8.</p>	<p>[WJG comments upon draft Policy H8 and raises concerns with the following elements:]</p> <ul style="list-style-type: none">· That nominations agreements should, as detailed within Part 3 of the draft policy, be “for occupation by students of one or more higher education providers with a campus based in Newham”.		3			H8 Purpose-built student accommodation	Homes	Reg18-E-076/007 b	Watkins Jones Group PLC	Reg18-E-076

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to the need to allow more flexibility for higher education providers to sign up to nominations agreements. Key changes include requiring the use of reasonable endeavours to reach an agreement and implementing a cascade mechanism in the event an agreement cannot be reached in an academic year. More stringent requirements are set for proposals that would create or worsen an oversaturation of purpose-built student accommodation, and these proposals will not be subject to a cascade mechanism. Please see the new wording in Policy H8.	[WJG comments upon draft Policy H8 and raises concerns with the following elements:] · The timing of a nominations agreement as detailed within Part 3 of the draft policy which states “the nominations agreement should be agreed prior the commencement of above ground works”.		3			H8 Purpose-built student accommodation	Homes	Reg18-E-076/007c	Watkins Jones Group PLC	Reg18-E-076

Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/008	Homes	H8 Purpose- built student accommo- dation						<p>The Overarching Need for PBSA in Newham and Students Trends</p> <p>Policy 62 of the NPPF recognises that local planning authorities should assess the need for different types of housing, including PBSA: “Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”. Planning Practice Guidance adds: “Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus ... They will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements”. Planning Practice Guidance, ID 2a-017-20190220</p> <p>Policy H1 of the London Plan set housing plan targets. The Mayor’s London-wide Strategic Housing Market Assessment (SHMA) identified need for 66,000 additional homes per year. The SHMA explores the specific requirements for purpose-built student accommodation within the overall figure.</p> <p>Paragraph 4.1.2 of the London Plan states: “For the purposes of the Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets. ... Because of London’s ability to plan strategically, boroughs are not required to carry out their own housing needs assessment but must plan for, and seek to deliver, the housing targets in this Plan”.</p> <p>The related footnote goes on to state:</p>	Comment noted.
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										<p>“Where boroughs wish to commission their own research on housing requirements to complement the London-wide SHMA, they are encouraged to do this on a sub-regional rather than single-borough basis”.</p>	
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Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/009	Homes	H8 Purpose- built student accommo- dation			1		<p>WJG considers that the Council has not fully addressed the need for PBSA in the borough. The Council's approach towards PBSA should be supported by a clearly set out understanding of the need for PBSA in Newham. It is questionable whether the suggested policy approach for addressing this is backed by sound evidence. Brief mention of PBSA is made within the Council's Strategic Housing Market Assessment (SHMA, June 2022) authored by Opinion Research Services (ORS). Within the draft Local Plan, the Council has also stated that the SHMA provides the evidence base upon which Policy H5 has been drafted and thus its approach to PBSA in the borough.</p> <p>The SHMA details that:</p> <ul style="list-style-type: none"> · The number of households comprising of only students has nearly doubled since 2011. · It is expected that students attending new university campuses in Stratford will increase the number of students studying in Newham by between 15,000 and 25,000. · The SHMA recognises that the increasing number of students will have increased pressure on housing stock, through an increased number of students renting privately. · The SHMA recognises that student accommodation counts towards housing completions (i.e. 2.5 student bedspace equals one additional residential dwelling). <p>The above points focus upon future student growth trends and less so on the current demand for student accommodation in the borough. The following presents some further indicators of the existing demand for PBSA. This information has been extracted from the Student Needs Assessment prepared by Knight Frank which accompanied WJG's application for PBSA on Grove Crescent Road:</p> <ul style="list-style-type: none"> · There are approximately 21,500 students attending universities Stratford. 	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>
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										<ul style="list-style-type: none"> · There are only around 5,700 PBSA bedspaces within this area (university or privately owned). This means that only 26% of students have access to PBSA, 74% do not. · The number of full-time students studying at institutions in Stratford has increased by 32% in the last five years. The supply of PBSA has not kept up with demand. The problem will be further exacerbated in new supply is constrained. · It is estimated that approximately 10,000 additional students will be studying in Stratford by 2027. · This will result in students occupying other forms of residential accommodation in the borough (e.g. uncontrolled houses in multiple occupation) needed by other residents within the borough. <p>Student accommodation trends have also been changing in recent years, with more second and later year students, as well as postgraduates, favouring PBSA over other forms of accommodation (e.g. HMOs). Evidence of this is provided by Pavilion Court in Wembley, a 699 bed PBSA development managed by Fresh. Within this academic year, only 16% of residents are first year students. This proportion of first year students is reflective of PBSA developments managed by Fresh across the UK and over recent years.</p> <p>The modern student values the security, convenience and inclusivity provided by PBSA. Besides rental cost, there are many reasons why students choose to live in PBSA over HMOs. This can include, amongst other matters:</p> <ul style="list-style-type: none"> · The quality of the accommodation. PBSA is developed, operated, and maintained at a higher standard. It also typically has a better standard of broadband/ Wi-Fi, study space and socialising space based on tried and tested designs. The houses that are now registered as HMOs were 	
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										<p>typically originally designed for the nuclear family.</p> <ul style="list-style-type: none"> · Utility bills are borne by the landlord in PBSA, meaning that tenants benefit from the savings generated by the efficiencies of scale in a larger building, that is part of a wider portfolio. This allows for students to insulate themselves from the 'cost-of-living crisis'. · PBSA is typically located in more accessible locations, closer to the city centre or universities (i.e. it is typically closer to the facilities which students require access to). This allows residents to integrate into the wider community as opposed to creating wide swathes of housing occupied by only students. · Trained management staff offers pastoral support. Those staff will have relationships with the support staff at universities and be able to support the needs of each of its residents, including supporting their mental health. · Superior amenity and communal facilities offered within PBSA, both internal and external. This is of benefit to residents' health, wellbeing and education experience. · Events and programmes provided by the operator/ manager of the PBSA. 	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p> <p>Furthermore, the policy approach in H2 has now changed to remove the exception for the loss of purpose-built student accommodation to non-residential uses. This approach seeks to protect all residential floorspace in light of Newham's significant housing need.</p>	<p>Is the Council's Policy Approach Towards PBSA Sound?</p> <p>The above factors contribute to the existing high demand for PBSA is across London strategically, and that this is only going to increase significantly due to the increasing numbers of students that will study in Stratford (e.g. UCL's East Campus which part opened in 2022 and the remainder will open this year, UAL's College of Fashion which opens this year and planned development at Loughborough University London) and the change in student trends (i.e. favouring PBSA over HMOs). The evidence demonstrates that a significant increase in the amount of PBSA is required in Newham. Through draft Policy H8 the Council is, however, seeking to introduce a restrictive approach to PBSA in the borough than is provided through Policy H15 of the London Plan. Given the current and increasing need for PBSA in Newham, this approach is not sound. It is also notable that draft Policy H2 protects all forms of housing other than student accommodation. Therefore Policy H8's approach will require even greater emphasis on the provision of new PBSA to address demand and accommodate for loss.</p>		1			H8 Purpose-built student accommodation	Homes	Reg18-E-076/010	Watkins Jones Group PLC	Reg18-E-076

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p> <p>Regarding the provision of purpose-built student accommodation freeing up private rented sector housing, the comment you have provided has not resulted in a change as we did not consider this change to be appropriate given that Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation.</p>	<p>WJG recognise that the Council, like most others, has competing land pressures and high housing targets. The provision of an increased amount of PBSA can offer wider housing benefits:</p> <ul style="list-style-type: none"> · Counting towards the Council's housing completions. This is recognised within the Council's SHMA. · Using land efficiently, resulting in land being available for other uses. · If sufficient PBSA is provided above existing and future demand, it will result in other existing and future homes being occupied by students (e.g. apartments, HMOs) being released back to the market and provided much needed homes for others (as recognised by NPPG, 034 Reference ID: 68-034- 20190722). 		1			H8 Purpose-built student accommodation	Homes	Reg18-E-076/011	Watkins Jones Group PLC	Reg18-E-076

Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/012	Homes	H8 Purpose- built student accommo- dation			1.c		<p>Location of PBSA</p> <p>Policy H8 is seeking to restrict PBSA only to specific parts of Stratford:</p> <p>a. “It is located within or adjacent to an existing campus development within the borough, or” – the draft policy does not define what would be considered to be ‘adjacent’ to a campus – we would suggest 1,200m (15 minute walk).</p> <p>b. “It is in a Town Centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); or” – Table 3 of the draft Local Plan suggests that PBSA would be acceptable</p> <p>in Stratford Metropolitan, East Ham, Forest Gate, Green Street, Canning Town, East Beckton and Beckton Riverside. There will be other sites which benefit from a high PTAL rating, are close or accessible to universities and which would not fall within this definition. It is suggested that, in line with the adopted Local Plan, it is stated that town centre locations are preferred for PBSA. This approach would indicate that there is a clear preference for PBSA to be located within a town centre, but there is no absolute requirement for PBSA to be located within such a location if the suitability of an alternative location can be demonstrated.</p> <p>c. In the Stratford and Maryland neighbourhood, it is solely providing a replacement facility with no net increase in bedspaces” – no boundary is provided within the draft Local Plan to define this. This criterion contradicts part b of the draft policy which suggests that PBSA is acceptable in Stratford.</p> <p>Additionally, Stratford and Maryland are neighbourhoods closest to the university campuses and therefore this approach does not follow good planning and sustainability principles. There will be sites within these neighbourhoods which are highly accessible and potentially suitable for PBSA (e.g. WJG’s</p>	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>
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										<p>development on Grove Crescent Road) and would provide deliverable solutions to meeting the Council's significant and increasing need for PBSA. Part C of the policy should be removed. WJG questions whether the Council has assessed whether the above approach would provide sufficient sites to cater for the significant and increasing demand for PBSA as detailed earlier. No justification for this approach is provided within the draft Local Plan or within the supporting documents (e.g. SHMA).</p> <p>WJG considers that the approach suggested by the Council is too restrictive and will not result in the supply of sufficient PBSA bedspaces. WJG also considers that the approach suggested by draft Policy H8 is not in conformity with the London Plan. WJG considers that the Local Plan should confirm with the approach detailed within Policy H15B of the London Plan, namely: "Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes".</p> <p>WJG recognises that Newham's Local Plan adopts a town centre or campus first approach to PBSA and would support a similar approach on the basis that it does not mean that PBSA must be located within the town centre or campus. The LLDC has adopted this approach in Policy H4 of its Local Plan (2020), an approach which WJG would also support in Newham. Policy H4 of the LLDC Local Plan states: "Meet identified strategic needs for student accommodation and be directed to appropriate locations within or on the edge of the Metropolitan Centre. Proposals outside these locations will be acceptable where they are suitably located for easy access by walking,</p>	
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										cycling or public transport to the higher education provider/s to which the proposal is linked"	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<p>Nominations Agreements with Newham Based Institutions</p> <p>The London Plan recognises that is a demand for PBSA across London and that students may not live within the borough where they study. This is also recognised within para 6.125 of the Council's SHMA which states "in London it is common for students to attend a university in one Borough while residing in a different one". Whilst there is a significant and increasing need for PBSA in Stratford, and it is thus likely that new PBSA provided within the borough will be occupied by students studying in Stratford, the approach advocated within draft Policy H8(3) is not in conformity with the London Plan. WJG encourages the Council to remove this element of the policy and replicate the cross London approach advocated by the London Plan.</p> <p>Paragraph 4.15.3 of the London Plan states: "The strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period with changes in higher education providers' estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding. ... There is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed."</p>		3			H8 Purpose-built student accommodation	Homes	Reg18-E-076/013 a	Watkins Jones Group PLC	Reg18-E-076

Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/013 b	Homes	H8 Purpose- built student accommo- dation			3		<p>Nominations Agreement Timing</p> <p>The Council provides no justification, either within the draft Local Plan or supportive documents, as to why the timing of the submission of the of a nomination agreement should vary from that within the London Plan. The Council is suggesting that a nominations agreement should be submitted to the Council prior to the commencement of above ground works, whereas the London Plan requires this to be submitted prior to the occupation of the PBSA. Support letters from universities are proposed at planning application stage. The approach advocated within Policy H15 of the London Plan is to demonstrate need for the proposed student accommodation – occupation is therefore a relevant appropriate trigger point. The approach reflected within Policy H15 was carefully considered by the Mayor’s Academic Forum (MAF). The MAF is chaired by the GLA and composed of representatives from the London boroughs, universities, private and voluntary student accommodation providers and students. The MAF is therefore the group of organisations and parties to whom the approach advocated by the London Plan will directly impact and apply.</p> <p>The MAF detailed within is meeting on 14 July 2017 the reasons why a nominations agreement can only be provided immediately prior to the occupation of a PBSA development. The minutes of the meeting are presented below:</p> <p>“MAF members agreed with the need for the accommodating to be secured for use by students as is required by current policy. Members considered the requirement to have an agreement with a HEI was useful for identifying the “bona fide” student accommodation providers in the market rather than a purely speculative developer of this</p>	<p>This policy approach has now changed due to the need to allow more flexibility for higher education providers to sign up to nominations agreements. Key changes include requiring the use of reasonable endeavours to reach an agreement and implementing a cascade mechanism in the event an agreement cannot be reached in an academic year. More stringent requirements are set for proposals that would create or worsen an oversaturation of purpose-built student accommodation, and these proposals will not be subject to a cascade mechanism. Please see the new wording in Policy H8.</p>
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										<p>specialist accommodation. Members noted that such agreements with HEI typically have a 7 to 10-year break clause. Member commented that the market in PBSA has matured over recent years in London and is less speculative, thus this policy proposal is in line with what is happening in the market. Members highlighted that the point of time at which the formal link was required by a policy was important as HEI do not necessarily want to sign up to a nominations agreement when the planning application is being decided but were more willing a year or less before the development is completed. Thus, the policy needs to allow the agreement with a HEI to be committed to later in the development process.”</p> <p>The approach suggested by Policy H8 is not sound, is not consistent with the London Plan and does not align with the point at which universities will enter into a nomination agreement. For this reason and to make this element of Policy H8 sound, the timing of the submission of a nomination agreement should align with the London Plan and its supporting evidence.</p>	
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Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/014	Homes	H8 Purpose- built student accommo- dation			4		H8.4	<p>Facilities within PBSA</p> <p>Part 4 of draft Policy H8 states: “Developments delivering purpose-built student accommodation should provide small-scale community facilities that meet the needs of the student population within a development unless they are located within 1,200 metres of existing student facilities that have sufficient capacity to meet increased needs”.</p> <p>Section H8.4 adds: “Developments for purpose-built student accommodation should provide small scale community facilities to meet the needs of their student population proportionate to the scale of the development. These should be designed to primarily meet the needs of the students living in the proposed accommodation, but should consider options to allow for access for the wider population outside of term time”.</p> <p>It is clear from the above that the primary focus of these spaces is to meet the needs of the development, but like the Grove Crescent Road development where community groups are able to use the common room, community use should be allowed where feasible. We consider that the use of the term ‘community facility’ used within the draft policy is incorrect and should be replaced by ‘communal facility’. This demonstrates that the primary use of such facilities are for the occupiers of the development.</p>	<p>This policy approach has now changed to reflect that the objective of this policy primarily relates to relieving pressures on local public spaces for study (such as libraries and gyms).</p>
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to explicitly express support for delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or adjacent to existing campuses where developments would create an oversaturation of purpose built student accommodation delivery. Please see the new wording in Policy H8.</p> <p>Policy H8 seeks to manage the cumulative effects of over-concentrations of student accommodation by applying additional policy limitations where developments would worsen these circumstances. More flexibility will be applied when accommodation delivery is linked to a campus in Newham, which is likely to result in wider economic benefits being delivered in the borough.</p>	<p>Policy H8 'PBSA' – despite a significant current undersupply and an increasing demand for PBSA, the Council is proposing a more restrictive approach to the delivery of PBSA than is advocated by Policy H15 of the London Plan. The approach suggested will significantly reduce the amount of PBSA delivered in Newham when it is needed most. WJG has made suggestions for revisions to Policy H8 to make this policy sound, largely replicating the approach reflected within the London Plan.</p>		1			H8 Purpose-built student accommodation	Homes	Reg18-E-076/022	Watkins Jones Group PLC	Reg18-E-076
	<p>Comment noted.</p>	<p>i. H9: Houses in Multiple Occupation and Large-scale Purpose-built Shared Living - Would you keep, change or add something to this policy? No comment</p>					H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-E-070/078	Aston Mansfield	Reg18-E-070

Reg18-K-009	Developer	Reg18-K-009/001	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						<p>[Vision and Objectives, Objective 5: Homes for Residents] "For the sake of prioritizing families you are making more vulnerable lower income individuals seeking for a high standard room accommodation within a HMO (C4). Students and professionals cannot find accommodations which in turn increases prices. I have tried through multiple agencies to find families for 8 months at reduced renting prices and we could not find any family. I then tried to sell the house to families and again: we could not find any buyer. The only calls we received were for professional sharers or students.</p> <p>The borough needs to allow HMO for sharers."</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Reg18-K-009	Developer	Reg18-K-009/002	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						<p>H9.1</p> <p>"In 2022 a Journal Article was published titled: ""Discriminatory Effects of Planning's Regulation of Small HMO"" stating that introducing the Article 4 caused ""prejudice to lower-income groups"" as planner assumed HMO were against ""destabilising the preferred social order"". This resulted in ""higher housing costs and restricted opportunities for group members to foster alternative identities and cultures"".</p> <p>Can you please have a read and set acceptance criterias to allow Small HMO as currently all landlords have their application rejected in Newham? Many thanks.</p> <p>Link: https://www.tandfonline.com/doi/full/10.1080/14649357.2022.2036800 "</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Reg18-K-025	Developer	Reg18-K-025/001	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						H9.1	<p>"I own an house but was rejected to convert it to HMO as Newham refuses all applications despite having done all the works to achieve a high standard of living.</p> <p>I request for the Planning Team to approve conversions to Small HMO on the basis of high standards of living conditions."</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Reg18-K-038	Developer	Reg18-K-038/001	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living					H9.1	<p>Please allow House in Multiple Occupation conversion. The Planning team is rejecting ALL applications and we cannot find families even after multiple price reduction (£1,800pm for a family of 4)... The renting agency I am working with has not been able to find a family even after looking for 8 months. He received a high demand of enquiries only from professional renters or students.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Reg18-K-044	Developer	Reg18-K-044/001	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						<p>H9.1 All House of Multiple Occupation (C4) are systematically being refused by the Planning team stating they want families despite being accepted by the Licensing team. But there are no families compared to professionals looking to rent. Please allow HMO of good standard to be approved.</p> <p>Also: Why do we have 2 teams with opposite views to approve a HMO license? There should be only one team in charge to approve this.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The policy approach set out in policy H2 has now changed due to clarify those exceptions where we will allow the conversion of a family dwellinghouse to a House in Multiple Occupation. Please see the new wording in Policy H2. The comment you have provided has not resulted in a change as we did not consider this change to be necessary due to the flexibility provided in policy H2 to allow for Houses in Multiple Occupation to be delivered for a temporary period where they meet the housing needs of Newham Care Leavers, single homeless residents or residents who are owed a homelessness duty by the Council. It is considered this would allow sufficient flexibility for third sector organisations to help house residents where meeting one of these identified housing needs.	Need to work better with the third sector organisations. Issues of applying for HMO licences as planning permission difficult to obtain.					H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-S-002/006	Homelessness forum	Reg18-S-002
	Comment noted. Applications will be assessed against the requirements of the development plan as a whole, including the draft Local Plan's design policies.	6) It is recommended that Policy H9 Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living (page 191) that are approved are also required to meet the SBD requirements as per Policy D1. This is to ensure physical measures alongside the proposed Management Plans mentioned in H9.3 (page 193) will ensure the best safety for all users of the development.		3.f			H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-E-011/010	Metropolitan Police Service - Designing Out Crime	Reg18-E-011

Reg18 -E-090	Resident	Reg18- E- 090/008	Homes	H9 HMOs and Large- Scale Purpose- Built Shared Living							<p>HMOs: The pages leading up to 191 seem to show the typical (snooty/middle-class) antipathy towards them, even though it's the only thing available for most young single people.</p> <p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Reg18 -E-090	Resident	Reg18- E- 090/009	Homes	H9 HMOs and Large- Scale Purpose- Built Shared Living						<p>But why should it have to be the only thing available for singles of modest means who haven't been able to wangle social housing? Why can't there be small-scale housing that is more self-contained, with kitchen facilities &/or en suite bathroom?, which can average at the same density as many shared houses, taking shared living rooms etc into account.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as our policy approach requiring nominations agreements for student accommodation reflects the requirements of the London Plan, which requires the majority of the bedrooms in a development to be secured through a nomination agreement for occupation by students of one or more higher education provide.	I understand some student accommodation is like this - why should only registered students be allowed to live in formats classified as 'student housing'?					H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-E-090/010	Resident	Reg18-E-090

Reg18 -E-098	Resident	Reg18- E- 098/039	Homes	H9 HMOs and Large- Scale Purpose- Built Shared Living							<p>Smaller units and new HMOs through conversion should be forbidden.</p> <p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Reg18-K-003	Resident	Reg18-K-003/013	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			1		H9.1	<p>If you can't rent it out, maybe you are asking for too much money. We like living in Newham, and we want families living around us, not students that change every year [A:4] [Originally submitted on comment on H9.1]</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Reg18-K-043	Resident	Reg18-K-043/001	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living					H9.1	<p>Home ownership should be encouraged, not HMO. HMO means having people coming and going and not caring about the local community and the public realm. No wonder why these type of consultations have low turnout if you take in consideration the whole population of the borough... nobody cares cause nobody lives here steadily!</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-011	Resident	Reg18-T-011/009	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						[Keep it] I feel HMOs are a real problem in the borough and reducing their number will cut down on incidents of fly-tipping, anti-social behaviour and [exploitative practices on the part of landlords].	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as while the family housing is the type of accommodation most needed in the borough, the policies recognise there are some areas where the delivery of houses in multiple occupation should be supported to meet the need of single residents. For more intensely occupied larger houses in multiple occupation, these should be directed to Town and Local Centres or along major roads, so as residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing. In the majority of cases, the delivery of houses in multiple occupation should not result in the conversion of family-sized accommodation, with the exception of the policy requirements of policy H2.</p> <p>If you experience issues of anti-social behaviour concerning a particular property, our colleagues are able to help, and reports can be made on Newham's website https://www.newham.gov.uk/public-health-safety/anti-social-nuisance-behaviour.</p>
Reg18-T-011	Resident	Reg18-T-011/010	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						[Keep it] I feel HMOs are a real problem in the borough and reducing their number will cut down on [incidents of fly-tipping, anti-social behaviour and] exploitative practices on the part of landlords.	A change to this policy approach has not been made. We did not consider this change to be necessary as requirements in policies H9 and H11 should help address these concerns. This includes the need for accommodation to have a management plan. These concerns will also be partly addressed through the borough's landlord

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	licencing scheme, which requires rented properties in the borough to meet required quality standards.										
	Support noted. However, this policy approach has now changed to apply the requirement for rents to be capped at Local Housing Allowance Shared Accommodation rates only to those homes secured for Newham Care Leavers and single homeless people secured via Policy H2. This is due to this requirement being too onerous to deliver via a legal agreement for houses in multiple occupation under ten bed spaces. Please see the new wording in H9.1.			4			H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-T-011/011	Resident	Reg18-T-011
	A change to this policy approach has not been made. We did not consider this change to be necessary as requirements in policies H9 and H11 should help address these concerns. This includes the need for accommodation to have a management plan. These concerns will also be partly addressed through the borough's landlord licencing scheme, which requires rented properties in the borough to meet required quality standards.						H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-T-011/012	Resident	Reg18-T-011
	Unfortunately it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.						H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-T-019/017	Resident	Reg18-T-019

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses this topic through policies on houses in multiple occupation, large-scale purpose-built shared living and housing design quality. However, it cannot deliver the change you have requested. Our colleagues in Private Sector Housing and Planning Enforcement are able to help. The borough's landlord licencing scheme requires rented properties in the borough to meet required quality standards, and our enforcement team can investigate properties which don't benefit from planning permission.	[Add to it] Continue and develop licensing and enforcement.					H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-T-034/038	Resident	Reg18-T-034

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>[Add to it] Ensure tenants and landlords conform with expectations around waste, flytipping etc.</p> <p>A change to this policy approach has not been made. We did not consider this change to be appropriate as while family housing is the type of accommodation most needed in the borough, the policies recognise there are some areas where the delivery of houses in multiple occupation should be supported to meet the need of single residents. For more intensely occupied larger houses in multiple occupation, these should be directed to Town and Local Centres or along major roads, so as residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing. In the majority of cases, the delivery of houses in multiple occupation should not result in the conversion of family-sized accommodation, with the exception of the policy requirements of policy H2.</p> <p>These concerns will also be partly addressed through the borough's landlord licencing scheme, which requires rented properties in the borough to meet required quality standards.</p> <p>If you experience issues of anti-social behaviour concerning a particular property, our colleagues are able to help, and reports can be made on Newham's website https://www.newham.gov.uk/public-health-safety/anti-social-nuisance-behaviour.</p>			3			H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-T-034/039	Resident	Reg18-T-034

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/040	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			3			[Add to it] Ensure good quality housing, as poorly maintained, overcrowded and poor quality accommodation impacts the area.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as requirements in policies H9 and H11 should help address these concerns. This includes the need for accommodation to have a management plan. These concerns will also be partly addressed through the borough's landlord licencing scheme, which requires rented properties in the borough to meet required quality standards.</p> <p>In the shorter term, we have commissioned some research into how the Council could mitigate some of the negative health and wellbeing impacts of overcrowding. This aims to improve the experience of living in an overcrowded household, especially for families with children. The research will report its findings in early 2024.</p> <p>The Council's Housing team also changed our allocations policy in February 2022 to give greater priority to households who are severely overcrowded (by two or more bedrooms) if they have another housing need, for example medical or homelessness.</p>
Reg18-T-057	Resident	Reg18-T-057/035	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						[Add to it] D	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>[Change it] no shared living please, shared living scheme destroys privacy, independency, health and safety issues, unsecurity, health problems</p> <p>A change to this policy approach has not been made. We did not consider this change to be appropriate as while family housing is the type of accommodation most needed in the borough, the policies recognise there are some areas where the delivery of houses in multiple occupation should be supported to meet the need of single residents. For more intensely occupied larger houses in multiple occupation, these should be directed to Town and Local Centres or along major roads, so as residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing. In the majority of cases, the delivery of houses in multiple occupation should not result in the conversion of family-sized accommodation, with the exception of the policy requirements of policy H2.</p> <p>If you experience issues of anti-social behaviour concerning a particular property, our colleagues are able to help, and reports can be made on Newham's website https://www.newham.gov.uk/public-health-safety/anti-social-nuisance-behaviour.</p>						H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-T-088/019	Resident	Reg18-T-088

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as while family housing is the type of accommodation most needed in the borough, the policies recognise there are some areas where the delivery of houses in multiple occupation should be supported to meet the need of single residents. For more intensely occupied larger houses in multiple occupation, these should be directed to Town and Local Centres or along major roads, so as residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing. In the majority of cases, the delivery of houses in multiple occupation should not result in the conversion of family-sized accommodation, with the exception of the policy requirements of policy H2.</p> <p>If you experience issues of anti-social behaviour concerning a particular property, our colleagues are able to help, and reports can be made on Newham's website https://www.newham.gov.uk/public-health-safety/anti-social-nuisance-behaviour.</p>	[Change it] More consideration for community					H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-T-103/023	Resident	Reg18-T-103
	Support noted.	[Keep it]					H9 HMOs and Large-Scale Purpose-Built	Homes	Reg18-T-105/020	Resident	Reg18-T-105

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-126	Resident	Reg18-T-126/017	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						[Change it]	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.

Reg18-S-001	Shelter	Reg18-S-001/001	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living							<p>Would it be possible to monitor / propose a limit on loss of family homes to HMOs. Could this be linked to the number needed?</p> <p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household represent a relatively small proportion of</p>
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											<p>housing need in the borough, it is important that Local Plan policies continue to protect family-sized dwellings from conversion. However, while the family housing is the type of accommodation most needed in the borough, the policies recognise there are some areas where the delivery of houses in multiple occupation should be supported to meet the need of single residents. For more intensely occupied larger houses in multiple occupation, these should be directed to Town and Local Centres or along major roads, so as residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing. In the majority of cases, the delivery of houses in multiple occupation should not result in the conversion of family-sized accommodation, with the exception of the policy requirements of policy H2.</p>
Reg18-T-063	Student	Reg18-T-063/008	Homes	H9 HMOs and Large-Scale Purpose-						[Keep it] Easily move to university and job	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							Built Shared Living				
	<p>This policy approach has now changed due to a change in the implementation approach for securing policy H2.5. The policy now seeks to secure this change of use through temporary planning permissions, rather than a legal agreement. Please see the new wording in Policy H2 and H9. The comment you have provided has not resulted in a change as we did not consider this change to be necessary given the removal of this policy clause. Furthermore, this exception set out in policy H2 is a specific exception to meet the needs of homeless people in Newham and Newham care leavers, whose housing need cannot be met through alternative means. A significant amount of purpose-built student accommodation is already being delivered in Newham, and therefore we do not consider this justifies an additional exception being added to the policy clause in H2.</p>	<p>Policy H9 'Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living'</p> <p>Part 2 of Policy H9 seeks to manage the loss of houses in multiple occupation (HMOs):</p> <p>2. The loss of Houses in Multiple Occupation or Large Houses in Multiple Occupation secured as housing for Newham Care Leavers or people placed or due to be placed in emergency temporary accommodation by Newham Council under Policy H2.5 is only acceptable where the proposed use is family housing.</p> <p>Unite make the following comments on the restrictions posed by this policy:</p> <ul style="list-style-type: none"> • Policy H9 limits the replacement of HMOs solely to family housing and could be expanded to include purpose built student accommodation as there is a defined need for PBSA, as demonstrated above. 		2			H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-E-119/013	Unite Group plc	Reg18-E-119

Reg18-E-119	Unite Group plc	Reg18-E-119/015	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						<p>• Additionally, as Newham's population of 25-29 year olds is expected to rise by nearly 9,500 by 2038, there is also a need for large scale purpose built living to cater for this alongside students moving out of PBSA. Policy H16 'Large-scale purpose-built shared living' of The London Plan recognises that this form of development holds the potential to provide housing for single person households who cannot or choose not to live in either HMOs or self-contained homes.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation and Large-Scale Purpose-Built Shared Living will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household</p>
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												represent a relatively small proportion of housing need in the borough, it is important that Local Plan policies continue to protect family-sized dwellings from conversion. However, while the family housing is the type of accommodation most needed in the borough, the policies recognise there are some areas where the delivery of houses in multiple occupation and Large-Scale Purpose-Built Shared Living should be supported to meet the need of single residents. For more intensely occupied larger houses in multiple occupation and Large-Scale Purpose-Built Shared Living, these should be directed to Town and Local Centres or along major roads, so as residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing. In the majority of cases, the delivery of houses in multiple occupation and Large-Scale Purpose-Built Shared Living should not result in the conversion of family-sized accommodation, with the exception of the policy requirements of policy H2.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/017	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			5			<p>Part 5 of Policy H9 requires either the on-site provision of affordable housing or a payment in lieu greater than that sought for conventional residential development.</p> <p>5. Large-Scale Purpose-Built Shared Living developments should deliver:</p> <p>a. affordable housing in accordance with Policy H3, where accommodation is being delivered as part of a wider mix of tenures within the application boundary; or</p> <p>b. a payment in lieu contribution towards conventional affordable housing. The payment in lieu contribution should secure a higher level of affordable housing provision than the 50 per cent strategic target sought by Policy H3.1.</p> <p>Unite comment that:</p> <ul style="list-style-type: none"> • The provision of onsite affordable housing and the alternative payment in lieu contribution sought from this policy does not align with contribution sought from the Policy H16 of The London Plan. • Part 9 of Policy H16 requires shared living developments to deliver “a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing...”. This clearly states that this affordable housing contribution should be off-site as opposed to onsite. 	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy approach in Policy H9 accords with the approach taken in Newham's adopted 2018 Local Plan. In Newham's adopted 2018 Local Plan, Policy H2.d states that "Exceptionally, consider off site provision or payment in lieu where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions/features or local context, (including tenure mix) and provided that it would result in the ability to secure a higher level of affordable housing provision."</p> <p>This position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. For these reasons we consider the proposed wording in the Local Plan to be appropriate.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy approach in Policy H9 accords with the approach taken in Newham's adopted 2018 Local Plan. In Newham's adopted 2018 Local Plan, Policy H2.d states that "Exceptionally, consider off site provision or payment in lieu where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions/features or local context, (including tenure mix) and provided that it would result in the ability to secure a higher level of affordable housing provision."</p> <p>This position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. For these reasons we consider the proposed wording in the Local Plan to be appropriate.</p>	<ul style="list-style-type: none"> • Additionally, Part 10 of Policy H16 states that "developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses". Therefore, the maximum percentage sought by The London Plan is 50% whereas Newham's draft policy is seeking a contribution greater than 50%. • As Newham's draft policy seeks contributions that either do not align with or are greater than The London Plan, this may have a significant impact on the viability of shared living developments. 		5			H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-E-119/018	Unite Group plc	Reg18-E-119

Reg18-E-119	Unite Group plc	Reg18-E-119/019	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living				3.155		<ul style="list-style-type: none"> As recognised in paragraph 3.155 of Policy H9's justification, large-scale purpose-built shared living developments hold the ability to free up conventional family housing and protect it from conversion into HMOs. Therefore, restrictions on the viability of shared living developments will place pressure on the housing needs. 	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policies H2 and H9 provide the circumstances in which delivery of houses in multiple occupation and Large-Scale Purpose-Built Shared Living will be supported, balancing this with the need to protect family housing.</p> <p>Figure 50 the Strategic Housing Market Assessment sets out the 'Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size assuming singles persons are allocated to 1 bedroom affordable rented rather than HMOs'. This table is intended to provide a comparison of the borough's local housing need if it were assumed that residents occupying shared homes instead occupied one bedroom affordable units. This table shows an increase in need of 7,583 one bedroom properties, and a loss of need of 2,491 three or more bed properties.</p> <p>A comparison of figure 48 and 50 demonstrate that around 56% of Newham's housing need is for three bedroom family homes, and that there is a need for around 2,491 houses in multiple occupation needed to meet the needs of other households. This equates to around 5% of Newham's housing need. It is considered the needs of the households requiring these houses in multiple occupation could be met through the provision of many types of housing, including houses in multiple occupation, large-scale purpose built shared living and intermediate affordable housing products. It should be noted that, as of September 2023 there are 3,105 licenced existing houses in multiple occupation in the borough.</p> <p>Given that the housing needs of other household</p>
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												represent a relatively small proportion of housing need in the borough, it is important that Local Plan policies continue to protect family-sized dwellings from conversion. However, while the family housing is the type of accommodation most needed in the borough, the policies recognise there are some areas where the delivery of houses in multiple occupation and Large-Scale Purpose-Built Shared Living should be supported to meet the need of single residents. For more intensely occupied larger houses in multiple occupation and Large-Scale Purpose-Built Shared Living, these should be directed to Town and Local Centres or along major roads, so as residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing. In the majority of cases, the delivery of houses in multiple occupation and Large-Scale Purpose-Built Shared Living should not result in the conversion of family-sized accommodation, with the exception of the policy requirements of policy H2.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/020	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			2			<p>Recommendations</p> <p>As a result of the above comments on Parts 2 and 5 of Policy H9, Unite make the following recommendations:</p> <ul style="list-style-type: none"> • The addition of PBSA and large-scale purpose-built living to the developments deemed as acceptable replacements of HMOs. 	<p>This policy approach has now changed due to a change in the implementation approach for securing policy H2.5. The policy now seeks to secure this change of use through temporary planning permissions, rather than a legal agreement. Please see the new wording in Policy H2 and H9. The comment you have provided has not resulted in a change as we did not consider this change to be necessary given the removal of this policy clause. Furthermore, this exception set out in policy H2 is a specific exception to meet the needs of homeless people in Newham and Newham care leavers, whose housing need cannot be met through alternative means. A significant amount of purpose-built student accommodation is already being delivered in Newham, and therefore we do not consider this justifies an additional exception being added to the policy clause in H2.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-119	Unite Group plc	Reg18-E-119/021	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			5			<p>[Recommendations As a result of the above comments on Parts 2 and 5 of Policy H9, Unite make the following recommendations:]</p> <ul style="list-style-type: none"> • The removal of the requirement for on-site affordable housing or a payment in lieu greater than that sought for conventional residential development to align with The London Plan Policy H16. 	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy approach in Policy H9 accords with the approach taken in Newham's adopted 2018 Local Plan. In Newham's adopted 2018 Local Plan, Policy H2.d states that "Exceptionally, consider off site provision or payment in lieu where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions/features or local context, (including tenure mix) and provided that it would result in the ability to secure a higher level of affordable housing provision."</p> <p>This position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. For these reasons we consider the proposed wording in the Local Plan to be appropriate.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	Co-Living WJG is supportive of the draft Plan including a co-living policy (Policy H9) and that this is largely reflective of the approach detailed within Policy H16 of the London Plan (2021).					H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-E-076/015	Watkins Jones Group PLC	Reg18-E-076

Reg18 -E-076	Watkins Jones Group PLC	Reg18- E- 076/016	Homes	H9 HMOs and Large- Scale Purpose- Built Shared Living			5.b		<p>The only element of the policy which WJ raises objection to is point 5b of the draft policy:</p> <p>"5. Large-Scale Purpose-Built Shared Living developments should deliver:</p> <p>a. Affordable housing in accordance with Policy H3, where accommodation is being delivered as part of a wider mix of tenures within the application boundary; or</p> <p>b. A payment in lieu contribution towards conventional affordable housing. The payment in lieu contribution should secure a higher level of contribution that the 50 per cent strategic target sought by Policy H3.1."</p> <p>This approach different from that stated within points 9 and 10 of Policy H16 of the London Plan:</p> <p>"9. It delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an: upfront cash in lieu payment to the local authority; or in perpetuity annual payment to the local authority.</p> <p>10. In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial Intensification, co-location and substitution, to be provided at a discount of 50 per cent or the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications, however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review".</p> <p>The accompanying text states that evidence based which has been used to inform Policy H9 is the Council's SHMA (referred to earlier) and the</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy approach in Policy H9 accords with the approach taken in Newham's adopted 2018 Local Plan. In Newham's adopted 2018 Local Plan, Policy H2.d states that "Exceptionally, consider off site provision or payment in lieu where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions/features or local context, (including tenure mix) and provided that it would result in the ability to secure a higher level of affordable housing provision."</p> <p>This position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. For these reasons we consider the proposed wording in the Local Plan to be appropriate.</p>
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										<p>Local Plan Viability Assessment (November 2022) prepared by BNP Paribas.</p> <p>Neither of these documents provide justification or explanation as to why the approach advocated by the draft Policy H9 of the Local Plan is different to the approach detailed in Policy H16 of the London Plan.</p> <p>In the absence of evidence justifying an alternative approach, and in order to make this policy sound, WJG requests that the Council adopts the approach detailed within Policy H16 of the London Plan.</p>	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy approach in Policy H9 accords with the approach taken in Newham's adopted 2018 Local Plan. In Newham's adopted 2018 Local Plan, Policy H2.d states that "Exceptionally, consider off site provision or payment in lieu where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions/features or local context, (including tenure mix) and provided that it would result in the ability to secure a higher level of affordable housing provision."</p> <p>This position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. For these reasons we consider the proposed wording in the Local Plan to be appropriate.</p>			5.b			H9 HMOs and Large-Scale Purpose-Built Shared Living	Homes	Reg18-E-076/023	Watkins Jones Group PLC	Reg18-E-076

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-103	Resident	Reg18-T-103/018b	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						[Change it] [Community spaces and] homes are being bought up by wealthy foreign investors	The Local Plan addresses the issue of meeting housing need through our housing policies, including requirements to deliver more family-sized and affordable homes. However, it cannot deliver influence who the end purchaser of a development is. It should also be noted that research commissioned by the Greater London Authority shows that the impact of foreign investors is mainly felt in zones 1 and 2, where demand is higher, and that the local authorities where new development has been concentrated are not in the main where overseas buyers are most active (https://www.lse.ac.uk/business/consulting/assets/documents/the-role-of-overseas-investors-in-the-london-new-build-residential-market.pdf). This research suggests these buying patterns may not affect Newham to as greater extent as other more centrally located boroughs.
Reg18-E-148	City of London	Reg18-E-148/036	Homes							Whilst it should be made clear that City of London is currently exploring potential development options for the Site and as such we do not wish to offer any detailed comments, it should be noted that the City of London is broadly supportive of the Council's approach to the delivery of new homes and employment floorspace as set out within Draft Policies H1-H11 and Draft Policies J1-J4 respectively.	Support noted.
Reg18-Ae-001	East Ham Assembly	Reg18-Ae-001/181	Homes							PRS - Creative use of LLS to support Plan policies	Unfortunately it was not clear what change or addition you wanted to make to this part of the Plan.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-076	Watkins Jones Group PLC	Reg18-E-076/002	Homes							<p>Scope of Representations</p> <p>Our representations focus on the land use policies in the consultation document relevant to the residential tenures that we deliver. As such, this representation focuses primarily on the following policies:</p> <ul style="list-style-type: none"> · Build to Rent (BTR) – Policy H4, H5 and H11 · Purpose Built Student Accommodation (PBSA) – Policy H8 · Co-Living – Policy H9 and H11 <p>These are addressed in turn, along with our proposed recommendations to ensure that the Plan meets the tests of soundness set out in Paragraph 35 of the National Planning Policy Framework (NPPF) – namely, positively prepared, justified, effective and consistent with national policy.</p>	Comment noted.
Reg18-E-070	Aston Mansfield	Reg18-E-070/079	Homes	H10 Gypsy and Traveller Accommodation						<p>j. H10: Gypsy and Traveller Accommodation - Would you keep, change or add something to this policy?</p> <p>No comment</p>	Comment noted.
Reg18-E-072	Barking and Dagenham Council	Reg18-E-072/019	Homes	H10 Gypsy and Traveller Accommodation						<p>Gypsy and Traveller Site Allocations We will continue to consider any cross-boundary issues that may need to be addressed through a Statement of Common Ground, particularly in light of the recent Smith judgment concerning the definition of Gypsies and Travellers for Planning purposes.</p>	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy's justification text has now changed to set out that we will seek to meet the need for new pitches for members of the community identified in our evidence base, reflective of recent changes to the Planning Policy for Traveller Sites. We will seek to do this through the Council's Small Sites Options Appraisals and Modular construction programme. Please see the new wording in the justification text for Policy H10.	<p>Gypsy and traveller accommodation sites</p> <p>I have some concerns about the evidence base and policy on this. I am concerned that the council is colluding with the discriminatory attitude and policies of the current Government. The Government is overtly discriminatory against these communities and all the representative organisations state this and are running campaigns against Government proposals. I know that the Council only has an obligation to go by the legal definition of gypsy and traveller, and to meet the legal obligations. But what I don't understand is whether it is actually unlawful to go beyond that.</p> <p>The problem with the current definition is that it only looks at those who have not permanently ceased travelling. But the laws going through Parliament at the moment, together with the general increased hostility and general toughening up against gypsies and travellers means that many are being forced to permanently cease travelling or have already been forced to do so. This is set to majorly increase in the future when this discriminatory laws go through.</p>		2			H10 Gypsy and Traveller Accommodation	Homes	Reg18-E-027/029a	Resident	Reg18-E-027

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>The Gypsy and Traveller Needs Assessment sets out that since the changes to the PPTS in August 2015 the ORS GTAA methodology has been repeatedly found to be sound and robust.</p> <p>The fieldwork for this study was completed between January 2022 and February 2022 and researchers were able to collect information on all identified residents. Given ORS's methodology has been found to be sound through multiple Local Plan examinations, we consider the evidence to provide a robust methodology and thorough assessment of accommodation needs for the Gypsy, Roma and Traveller communities in Newham.</p> <p>The policy wording has also now changed to set out that we will consider any additional need identified at the regional level through the preparation of a London-wide Gypsy and Traveller Accommodation Needs Assessment. Please see the new wording in the justification text for Policy H11.</p>	<p>Gypsy and Traveller Accommodation Assessment</p>		2			H10 Gypsy and Traveller Accommodation	Homes	Reg18-E-027/029b	Resident	Reg18-E-027

Reg18 -E-027	Resident	Reg18- E- 027/030 a	Homes	H10 Gypsy and Traveller Accommo dation			2		<p>My own interviews with and experiences with gypsies and travellers</p> <p>I have had some fairly negative experiences of gypsies and travellers, and I think that unauthorised encampments cause a lot of problems. Equally problematic is travellers trying to continue to live a traditional traveller/gypsy way of life whilst living in bricks and mortar. But recent experiences at work have led me to have more empathy and to think that these problems are caused by insufficient traveller and gypsy sites.</p> <p>I think two types of traveller and gypsy sites are needed – those for people who have ceased travelling but still want to live together communally, and those who are still travelling.</p> <p>I work for a disabled people’s organisation, in South London, which includes services for people with mental health problems . I don’t work for a travellers organisation and never have. Part of my job is doing homeless applications for Disabled people and people with mental health problems. Recently, we have seen an increase in Irish Travellers with mental health problems approaching us for help with homelessness.</p> <p>For example, I am currently trying to help a woman from the Irish traveller community. She says she was brought up from the age of 7 in a Traveller site in South London, but as an adult has lived her entire life travelling in a caravan ‘just going from place to place, from land to land’, as she put it. She was until recently travelling in a caravan with her adult son, adult daughter, and her granddaughter. But she says it is now too difficult, because of the crackdowns on their way of life. So she has sold her caravan and they are all sofa-surfing on different travellers caravans on an authorised South London traveller site. She applied for a pitch on the site but there aren’t any.</p> <p>So she has been forced to do a homelessness</p>	<p>This policy's justification text has now changed to set out that we will seek to meet the need for new pitches for members of the community identified in our evidence base, reflective of recent changes to the Planning Policy for Traveller Sites. We will seek to do this through the Council's Small Sites Options Appraisals and Modular construction programme. Please see the new wording in the justification text for Policy H10. The policy also seeks to deliver high quality accommodation, to help address the health inequalities that Gypsy, Traveller and Travelling Showpersons communities can often face.</p>
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										<p>application – but she is absolutely terrified. She does not want to live in bricks and mortar. She does not want to live away from her community. But she has no choice.</p> <p>I don't think people like this lady will count in the official planning definition of traveller. But in reality she is, and the lack of specific traveller accommodation is severely affecting her.</p>	
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	This policy's justification text has now changed to set out that we will seek to meet the need for new pitches for members of the community identified in our evidence base, reflective of recent changes to the Planning Policy for Traveller Sites. We will seek to do this through the Council's Small Sites Options Appraisals and Modular construction programme. Please see the new wording in the justification text for Policy H10. The policy also seeks to deliver high quality accommodation, to help address the health inequalities that Gypsy, Traveller and Travelling Showpersons communities can often face.	In the middle of our appointment together, she suddenly got a phone call from someone telling her that her best friend had been found dead, suspected suicide. She herself is on prescribed medication for depression. Suicide is very high within the traveller community – and will get worse if Councils don't take the reality of their situation properly on board, regardless of what the Government's restrictive definitions may be.		2			H10 Gypsy and Traveller Accommodation	Homes	Reg18-E-027/030 b	Resident	Reg18-E-027

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		<p>Up until this point, I had had some fairly negative experiences of travellers and gypsies. But I think maybe it was because of not enough gypsy and traveller sites.</p> <p>The evidence base says there is a low level of unauthorised encampments. But it doesn't take into account gypsies and travellers trying to continue aspects of traveller site life, often involving unauthorised activities.</p> <p>I've lived in Newham for nearly 9 years, but my husband has lived here much longer. I lived most of my life in Redbridge, where I was born, and lived for a couple of years in Dagenham. In Redbridge, I lived next door to a Roma family. It was disastrous. Loads and loads of people in the Roma community used to squash in there several times a week, and to make it worse, they seemed to mainly want to always be outside in the garden, even in the winter, and often late at night. So it was really noisy.</p> <p>But now I think it was because they didn't want to be living in bricks and mortar, they wanted to be living altogether on a gypsy site. (I only think this should happen if they want it – I don't want to create a ghetto or exclude people from living wherever they want or taking part in the wider community.)</p>		2			H10 Gypsy and Traveller Accommodation	Homes	Reg18-E-027/030c	Resident	Reg18-E-027
		[Keep it]					H10 Gypsy and Traveller Accommodation	Homes	Reg18-T-011/013	Resident	Reg18-T-011

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-019	Resident	Reg18-T-019/018	Homes	H10 Gypsy and Traveller Accommodation						[Add to it] Need more info	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-057	Resident	Reg18-T-057/036	Homes	H10 Gypsy and Traveller Accommodation						[Add to it] E	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-088	Resident	Reg18-T-088/020	Homes	H10 Gypsy and Traveller Accommodation						[Change it] should be built separately with cheap accommodation	This policy's justification text has now changed to set out that we will seek to meet the need for new pitches for members of the community identified in our evidence base, reflective of recent changes to the Planning Policy for Traveller Sites. We will seek to do this through the Council's Small Sites Options Appraisals and Modular construction programme. Please see the new wording in the justification text for Policy H10.
Reg18-T-105	Resident	Reg18-T-105/021	Homes	H10 Gypsy and Traveller Accommodation						[Keep it]	Support noted.
Reg18-T-126	Resident	Reg18-T-126/018	Homes	H10 Gypsy and Traveller Accommodation						[Keep it]	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy requires applicants to demonstrate that sites can provide the associated necessary (primarily physical) infrastructure requirements to service the needs of a development or wider site. The implementation text for the policy clarifies that primary physical infrastructure should include accommodation and access for large vehicles.	[Keep it] Must have travelling vehicle near by House					H10 Gypsy and Traveller Accommodation	Homes	Reg18-T-063/009	Student	Reg18-T-063
	This policy approach has now changed to allow for assessment against HAPPI principles where accommodation for older people is not CQC regulated. Please see the new wording in Policy H11.	Criterion 3 fails to recognise that not all specialist housing for older people is registered with the CQC. For example, retirement living housing would typically be design to the HAPPI principles rather than any CQC standards. To ensure the policy is effective, it should require specialist housing to demonstrate high quality for the type of accommodation proposed.		3.a.i			H11 Housing Design Quality	Homes	Reg18-E-050/028	Anchor	Reg18-E-050
	Support noted.	k. H11: Housing Design Quality - Would you keep, change or add something to this policy?					H11 Housing Design Quality	Homes	Reg18-E-070/080	Aston Mansfield	Reg18-E-070

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.</p>	<p><i>All new housing development should be designed to:</i></p> <p><i>a. locate building structural elements to enable internal reconfiguration and avoid irregular geometry that limits reconfiguration of internal layouts. A minimum of two alternative furniture layouts should be possible for each habitable room.</i></p> <p>Object – Policy is highly prescriptive and as worded and could become a hindrance that impacts negatively on design and ability to make the most efficient use of land.</p> <p>Suggested change to wording</p> <p>a. locate building structural elements to enable future internal reconfiguration and [delete: avoid irregular geometry that limits reconfiguration of internal layouts. A minimum of two alternative furniture layouts should be possible for each habitable room.]</p>		1.a			H11 Housing Design Quality	Homes	Reg18-E-070/081	Aston Mansfield	Reg18-E-070

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-122	Ballymore	Reg18-E-122/013	Homes	H11 Housing Design Quality			4 to 5			<p>[Appendix 1] The provision of high-quality accessible communal amenity spaces is an important element of delivering quality housing developments.</p> <p>Whilst the intention to encourage provision of shared internal and external amenity spaces is supported, the application of minimum areas does not respond to the site characteristics. Without flexibility applied to the standards, housing proposals will look to balance the amount of housing against meeting the areas for internal and external amenity. This goes against the design-led approach to optimise sites and could lead to lower housing delivery.</p> <p>Consequently, Ballymore recommend that flexibility is applied to the policy to allow site characteristics and proximity to existing open space to help determine an acceptable provision of communal amenity space.</p>	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>

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Reg18-E-122	Ballymore	Reg18-E-122/014	Homes	H11 Housing Design Quality			6			[Appendix 1] Ballymore would also caution the reasonableness of the requirements in Part 6 to secure affordable housing tenants membership costs to on-site facilities at Council facility rates. Council facilities often benefit from subsidies helping lower membership fees and do not reflect a fair comparison. There are also concerns that it may not be legally sound for market tenures to subsidise amenity provision for affordable tenures.	This policy approach has now changed to require these facilities to be of comparable cost of other facilities (private and Council-run) in the locality, and to clarify how the policy should be implemented. Costs should not be subsidised via residents' service charges; instead, these facilities should be run as a separate business, with the cost of accessing these facilities being kept as low as possible to allow access for all. Please see the new wording in the implementation text for H11.6.
Reg18-E-077	Ballymore Group	Reg18-E-077/035	Homes	H11 Housing Design Quality						Ballymore always strives to provide high quality housing, both internally and externally, including flexible internal layouts that provide future residents with multiple options for how to decorate their spaces. Ballymore has over 40 years of experience delivering large scale developments using qualified and competent designers in all their schemes to ensure a high standard of living for all residents.	Comment noted.
Reg18-E-077	Ballymore Group	Reg18-E-077/036	Homes	H11 Housing Design Quality			1.a			However, the proposed requirement to provide a minimum of two alternative furniture layouts for each habitable room is excessive, unnecessary and unduly prescriptive and this requirement should be removed from the draft policy.	This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.	We agree that regular room layouts should be prioritised to avoid irregular geometry, however, a level of flexibility needs to be written into the policy to recognise that internal layouts can be driven by site constraints. We consider that providing regular shaped spaces should be sufficient to demonstrate flexibility and where irregular shaped units needs to be provided because of site-specific constraints, then these should be accepted if it can be demonstrated that typical furniture can be laid out within the home.		1.a			H11 Housing Design Quality	Homes	Reg18-E-077/037	Ballymore Group	Reg18-E-077
	A change to this policy approach has not been made. We did not consider this change to be appropriate as this requirement is important to help ensure high quality living conditions within new dwellings. However, the implementation text for policy H11 now specifies circumstances where one or two-bedroom single aspect homes may be acceptable, namely where they are generously sized, shallow in plan and east or west facing.	Part 2(e) of the draft policy seeks to avoid single-aspect units, particularly where these are north-facing. Ballymore agrees that north-facing single aspect units should preferably be avoided but a proportion of single aspect units is often unavoidable within a scheme, particularly with other competing requirements (including recent fire guidance changing requiring the provision of two stair cores in all buildings over 30m) which makes it even more difficult to provide dual aspect units without significantly reducing the number of units per core and therefore reducing the viability and deliverability of schemes. We therefore suggest that part 2(e) of the draft policy is amended to the following: ' <i>maximise dual aspect units and avoid single aspect north-facing units</i> '.		2.e			H11 Housing Design Quality	Homes	Reg18-E-077/038	Ballymore Group	Reg18-E-077

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-077	Ballymore Group	Reg18-E-077/039	Homes	H11 Housing Design Quality			9			Parts 7 and 9 of the policy relate to accessible homes, noting that social rented homes that are wheelchair user homes should be designed to meet Building Regulation M4[3](2)(b) standard (wheelchair accessible dwellings). It should be clarified that market and intermediate wheelchair homes are required to meet Building Regulation M4[3](2)(a) standard (wheelchair adaptable) rather than the higher M4[3](2)(b) standard.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy wording should not preclude the delivery of M4[3](2)(b) dwellings in private sector dwellings, albeit this is not a requirement as it will be for social rent homes.
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/039	Homes	H11 Housing Design Quality			2.a			<p>Housing space standards</p> <p>Housing space standards are of concern; it is vitally important that there is sufficient space for everyday home activities. As the COVID-19 pandemic showed, there was a lack of space for people to work from home in modern designed accommodation and have enough storage space for personal and food items. In addition, children did not have enough space to study, dining space was far too small for families to eat together and multi-generational living was not supported. The London Plan outlines space standards; however, schemes need to be assessed in terms of how occupants are likely to use spaces, and this requires design engagement with potential occupiers at the earliest stages.</p>	<p>Comment noted. This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording. Please see the new wording in Policy H11.</p> <p>Separately, policy H11 has now changed to incorporate a new policy clause that requires development referable to the Mayor of London to design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study'. This study will consider the design needs of neurodivergent residents, residents with learning disabilities and residents on Newham's housing waiting list. It will also seek to undertake engagement with residents whose access to housing is affected by these design needs. Please see the new wording in Policy H11. In addition, Policies D1 and BFN2 therefore require high quality and early engagement and co-production with communities on large schemes.</p>

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	the private rented sector, via our landlord licencing scheme.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as requirements for environmental improvements are set out in the Climate Emergency chapter of the Local Plan.	Repairs and improvements/conversions - policies to encourage environmental improvement					H11 Housing Design Quality	Homes	Reg18-Ae-001/175	East Ham Assembly	Reg18-Ae-001
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the approach in the Local Plan reflects regional and national policies. The National Planning Policy Framework (paragraph 62, p.17) requires Local Planning Authorities to assess the housing needed for different groups in the community and reflect this in planning policies. This includes people who rent their homes. Similarly, the London Plan (at 4.11.1, p.194) states that boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes.</p> <p>In the draft Local Plan we have policies on purpose built rented accommodation, houses in multiple occupation and large-scale purpose-built shared living developments, which include quality standards new developments are required to meet. However, we do not have influence over dwelling houses that change to rented accommodation or historic lawful houses</p>	PRS - 35% plus too many; leads to environmental degradation					H11 Housing Design Quality	Homes	Reg18-Ae-001/177	East Ham Assembly	Reg18-Ae-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	in multiple occupation, as these developments do not require planning permission.										
	The Local Plan addresses this topic through supporting the upgrading of homes to address fuel poverty and help combat the climate emergency. However, it cannot deliver the change you have requested. Our colleagues in Private Sector Housing help to improve homes in the private rented sector, via our landlord licencing scheme.	PRS - Policies to encourage programmes of R and I [Appears to mean repairs and improvements]					H11 Housing Design Quality	Homes	Reg18-Ae-001/179	East Ham Assembly	Reg18-Ae-001
	A change to this policy approach has not been made. We did not consider this change to be necessary as requirements for environmental improvements are set out in the Climate Emergency chapter of the Local Plan.	PRS - Policies that encourage environmental imp					H11 Housing Design Quality	Homes	Reg18-Ae-001/180	East Ham Assembly	Reg18-Ae-001

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/085	Homes	H11 Housing Design Quality			2.c		2	Policy H11.2.c. requires ground floor bedrooms to be located the rear of the dwelling. Implementation section H11.2. builds on this to add that bedrooms on the ground floor should consider providing ensuite facilities to allow for use by people with reduced mobility. It is essential that flood risk is considered when locating bedrooms on the ground floor as there must be no sleeping accommodation located below the tidal breach flood level. This is especially important for vulnerable users, and some sites will be more constrained in the delivery of accommodation for users with reduced mobility. We are pleased to see that this is recognised in implementation section H11.10, where it is stated that in areas of flood risk, site constraints may preclude wheelchair adapted accommodation being delivered on the ground floor of a development. However, this should be clarified and clearly stated in the policy wording itself.	This policy approach has now changed due to this requirement being too prescriptive. Please see the new wording in policy H11, which removes this requirement. Policy H11 separately allows for the provision of a portfolio approach where flood risk prevents the provision of wheelchair adaptable or adapted units on the ground floor of a development.
Reg18-E-130	Hadley Property Group	Reg18-E-130/129	Homes	H11 Housing Design Quality						Hadley is supportive of the housing design requirements to ensure well-designed homes for Newham residents, that seek to promote the health and well-being of residents.	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/130	Homes	H11 Housing Design Quality			7			It is supportive of providing wheelchair and affordable housing to ensure accessibility for everyone.	Support noted.

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Reg18-E-130	Hadley Property Group	Reg18-E-130/131	Homes	H11 Housing Design Quality			1.a			However, it stresses the need for flexibility with regard to the location of “building structural elements to enable internal reconfiguration” and the requirement for a “minimum of two alternative furniture layouts” which could impact on the ability to meet other design requirements and overall, deliver a high quality of design in a timely manner.	This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.
Reg18-E-130	Hadley Property Group	Reg18-E-130/132	Homes	H11 Housing Design Quality			1.a			As mentioned in the introduction to these representations, Hadley questions whether such overly prescriptive design comments are planning matters.	This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.
Reg18-E-130	Hadley Property Group	Reg18-E-130/133	Homes	H11 Housing Design Quality			2.d			Hadley recognises the need to maximise the number of dual-aspect homes “including all three or more bedroom dwellings”.	Support noted.
Reg18-E-130	Hadley Property Group	Reg18-E-130/134	Homes	H11 Housing Design Quality			2.d			However, due to design constraints it may not always be possible for all family homes to be dual aspect.	A change to this policy approach has not been made. We did not consider this change to be appropriate as this requirement is important to help ensure high quality living conditions within family-sized homes.
Reg18-E-130	Hadley Property Group	Reg18-E-130/135	Homes	H11 Housing Design Quality			1.b.iii			Hadley suggests that the HS11.1(b)(iii) requirement to ensure living areas and kitchen dining spaces receive direct sunlight for at least two hours a day should be removed as technical guidance may change and the guidance in place at the time of an application should be adhered to.	This policy approach has now changed to remove this policy clause. Please see the new wording in Policy H11, which retains the requirement to maximise internal levels of daylight through orientation, articulation and incorporation of breaks in massing. The policy’s implementation text also states that residential developments

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	should seek to comply with the Building Research Establishment (BRE).										
	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>			5			H11 Housing Design Quality	Homes	Reg18-E-130/136	Hadley Property Group	Reg18-E-130

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/137	Homes	H11 Housing Design Quality			6.b			Hadley does not support the prescriptive requirement in HS11.6(b) for a membership model for the provision of on-site services for affordable housing residents.	This policy approach has now changed to require these facilities to be of comparable cost of other facilities (private and Council-run) in the locality, and to clarify how the policy should be implemented. Costs should not be subsidised via residents' service charges; instead, these facilities should be run as a separate business, with the cost of accessing these facilities being kept as low as possible to allow access for all. Please see the new wording in the implementation text for H11.6.
Reg18-E-130	Hadley Property Group	Reg18-E-130/138	Homes	H11 Housing Design Quality			6.b			This matter should be assessed on a case-by-case basis with the affordable housing provider, so that a membership model does not increase the service charge to residents	This policy approach has now changed to require these facilities to be of comparable cost of other facilities (private and Council-run) in the locality, and to clarify how the policy should be implemented. Costs should not be subsidised via residents' service charges; instead, these facilities should be run as a separate business, with the cost of accessing these facilities being kept as low as possible to allow access for all. Please see the new wording in the implementation text for H11.6.
Reg18-E-130	Hadley Property Group	Reg18-E-130/139	Homes	H11 Housing Design Quality						Finally, Hadley questions whether the policy puts substantial emphasis on design requirements that go beyond the remit of a Local Plan. Those should form part of an SPG that provides design guidance for consideration through design development rather than a standard approach. Such SPG should be consulted on separately to allow sufficient consideration over the overly complex application of a series of extensive design recommendations.	Comment noted. This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording. Please see the new wording in Policy H11.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-S-002	Homelessne ss forum	Reg18-S-002/007	Homes	H11 Housing Design Quality						Need to drive up standards in PRS housing.	Comment noted. The Local Plan seeks to address the quality of new homes, including in the private rented sector, through the various requirements set out in Policy H11.
Reg18-E-105	IQL South	Reg18-E-105/029	Homes	H11 Housing Design Quality			4 and 5			IQL South supports the provision of high-quality accessible communal amenity spaces in major developments.	Support noted.
Reg18-E-105	IQL South	Reg18-E-105/030	Homes	H11 Housing Design Quality			4 and 5			These requirements will be in addition to the Housing quality and standards required to be met by London Plan Policy D6.	Comment noted. Please see the new wording in Policy H11.4 implementation text, which now sets out that the requirement for the provision of communal external amenity space is to be read in conjunction with the qualitative guidance within London Plan Policies S4 and D6.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p> <p>It is considered the requirement for external communal amenity space is required in addition to private amenity spaces as these spaces will serve different functions, and will be used by all residents of a development, including those with access to private gardens.</p>			4 and 5			H11 Housing Design Quality	Homes	Reg18-E-105/031	IQL South	Reg18-E-105

Comment Response	<p>Newham's Green and Waster Spaces Strategy shows the overall provision of publicly accessible space in Newham is considerably lower than our neighbouring boroughs, with a rate of just 0.71 hectares per 1,000 residents. All new major residential developments should be seeking to improve residents access to open space, and for this reason, we do not consider the proximity to existing open space sufficient justification to diverge from this policy requirements.</p>
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-096	L&Q	Reg18-E-096/017 a	Homes	H11 Housing Design Quality						We agree with the importance of ensuring housing design quality across all developments.	Support noted.
Reg18-E-096	L&Q	Reg18-E-096/017 b	Homes	H11 Housing Design Quality						However, in general, the requirements set out in Policy H11 are very prescriptive.	Comment noted. This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording. Please see the new wording in Policy H11.
Reg18-E-096	L&Q	Reg18-E-096/018	Homes	H11 Housing Design Quality			1.c			There are also some proposals that, as currently worded, are likely to be ineffective or cause unintended consequences. For example, the proposals to require staircases to be wide enough to enable active areas (e.g. seating and play) are likely to cause health and safety issues and potentially encourage anti-social behaviour.	A change to this policy approach has not been made. We did not consider this change to be necessary as this clause has now been fully deleted from the policy. This is due to the potential amenity and safety issues associated with the use of these spaces, particularly by children. It is considered the function this space can be met instead via private and public amenity spaces. Please see the new wording in policy H11.
Reg18-E-096	L&Q	Reg18-E-096/019	Homes	H11 Housing Design Quality			6.b			In addition, having differing pricing levels for access to on-site facilities according to the tenure is likely to be considered unfair by residents.	This policy approach has now changed to require these facilities to be of comparable cost of other facilities (private and Council-run) in the locality, and to clarify how the policy should be implemented. Costs should not be subsidised via residents' service charges; instead, these facilities should be run as a separate business, with the cost of accessing these facilities being kept as low as possible to allow access for all. Please see the new wording in the implementation text for H11.6.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/004	Homes	H11 Housing Design Quality			2.a			Housing - Family homes should have some garden space	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan includes

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	requirements for the provision of private amenity space for new homes under policy H11.										
	Support noted.	We are also encouraged to see robust and comprehensive design policies for housing that ensure that good housing design is embedded in the planning process from the outset.					H11 Housing Design Quality	Homes	Reg18- E- 134/013 d	London Borough of Waltham Forest	Reg18 -E-134
	Support noted.	We are also encouraged by the measures taken to address the Climate Emergency with the adoption of both active measures, such as improved thermal efficiency and more passive measures such as dual aspect design.		2			H11 Housing Design Quality	Homes	Reg18- E- 134/013 e	London Borough of Waltham Forest	Reg18 -E-134

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-073	Notting Hill Genesis	Reg18-E-073/014	Homes	H11 Housing Design Quality			1.a			<p>Housing Design Quality and Public Realm</p> <p>We note that the draft Local Plan Policy H11 (Housing Design Quality) (1a) requires:</p> <p>“All new housing development should be designed to:</p> <p>a. locate building structural elements to enable internal reconfiguration and avoid irregular geometry that limits reconfiguration of internal layouts. A minimum of two alternative furniture layouts should be possible for each habitable room.”</p> <p>As currently drafted, we consider this draft Policy to be unduly prescriptive and may result in constraining future development in the Borough by requiring homogeneous architectural design. The draft Local Plan would thereby not be justified or effective.</p>	<p>This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.	<p>[Appendix D] Policy H11 Housing design quality Pages 198 – 200 Proposed Suggested Amendments:</p> <p>1. All new housing development should be designed to:</p> <p>a. locate building structural elements to enable internal reconfiguration and avoid irregular geometry that limits reconfiguration of internal layouts. A minimum of two alternative furniture layouts should be possible for each habitable room; and</p> <p>Reason / Comment</p> <p>As currently drafted, we consider this draft Policy to be unduly prescriptive and may result in constraining future development in the Borough by requiring homogeneous architectural design. The draft Local Plan would thereby not be justified or effective.</p>		1.a			H11 Housing Design Quality	Homes	Reg18-E-073/031	Notting Hill Genesis	Reg18-E-073
	Comment noted.	<p>Draft Policy H11: Housing Design Quality</p> <p>In recognising the role of communal amenity spaces in creating new high quality places, it is intended that provision will be designed into any redevelopment proposals for the Site. The initial design work undertaken to date has demonstrated this, confirming capacity for external communal amenity space on the Site in addition to private external amenity space, public realm and urban greening.</p>		4			H11 Housing Design Quality	Homes	Reg18-E-078/050	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

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Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/051a	Homes	H11 Housing Design Quality			4			<p>Draft Policy H11, seeks the provision of both external and internal / sheltered communal amenity space as part of major and high-density developments, respectively. The specific quantum set out under Parts 4 [and 5] appear particularly onerous and potentially disproportionate, especially when considered alongside the other and in some cases competing policy requirements that any such proposals also have to satisfy. For large scale developments of 150+ homes, these represent landhungry requirements and brings into question what should be prioritised in support of scheme deliverability.</p> <p>We are not aware that the London Plan (2021) requires the provision of communal amenity space, either externally or internally as part of new developments and in turn, there are no set standards in policy for the size of these commensurate with the scale of the development.</p>	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>

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Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/051b	Homes	H11 Housing Design Quality			5			<p>Draft Policy H11, seeks the provision of both external and internal / sheltered communal amenity space as part of major and high-density developments, respectively. The specific quantum set out under Parts [4 and] 5 appear particularly onerous and potentially unproportionate, especially when considered alongside the other and in some cases competing policy requirements that any such proposals also have to satisfy. For large scale developments of 150+ homes, these represent landhungry requirements and brings into question what should be prioritised in support of scheme deliverability.</p> <p>We are not aware that the London Plan (2021) requires the provision of communal amenity space, either externally or internally as part of new developments and in turn, there are no set standards in policy for the size of these commensurate with the scale of the development.</p>	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>

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Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/052	Homes	H11 Housing Design Quality			4			<p>As noted above, the inclusion of external communal space in new developments is supported and should be encouraged but we would recommend that this is instead of promoting maximisation and through setting a minimum amount only.</p>	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>			4			H11 Housing Design Quality	Homes	Reg18-E-078/053	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

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Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/054	Homes	H11 Housing Design Quality			4.a			<p>Recommendations</p> <p>To ensure the Plan can be considered to be positively prepared and consistent with national and regional policy in line with NPPF 35, we would recommend the following amendments to draft policy wording:</p> <ul style="list-style-type: none"> · Policy H11 (Part 4. a.) – “maximise the quantum and quality of provision commensurate with the scale of development and provide a minimum of 50m² for the first ten units or private rooms (if not self-contained) and 1m² for each additional unit or private room (if not self-contained); and” 	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>

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Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/055	Homes	H11 Housing Design Quality			5			<p>[Recommendations To ensure the Plan can be considered to be positively prepared and consistent with national and regional policy in line with NPPF 35, we would recommend the following amendments to draft policy wording:]</p> <ul style="list-style-type: none"> · Policy H11 (Part 5.) – “High density developments, as defined in Policy D5, Large-Scale Purpose-Built Shared Living should incorporate at least one accessible communal amenity internal/sheltered space(s) of 50m2 for the first ten units and 1m2 for each additional unit, up to 200m2 net floorspace.” 	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>

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Reg18-E-082	Resident	Reg18-E-082/043	Homes	H11 Housing Design Quality		3.136				<ul style="list-style-type: none"> Page.164 (Homes – 3.136). Reference should be made not only to new housing contributing positively to residents’ health and wellbeing in terms of layout and lifetime home objectives but also in terms of meeting the diverse cultural needs of residents, such as facilitating multi-generational living, layout such as separate cooking and living spaces etc. House builders do not think about family dynamics, cultural needs and disability when planning homes which they should do, however it is important that the local planning authority i.e. Newham should remind them and ensure that they are considered. This would facilitate the way that people want to live rather than having to be constrained and limited by what other people (without cultural or lived experience) design and allocate for them. 	This policy approach has now changed to incorporate a new policy clause that requires development referable to the Mayor of London to design a proportion of social rent rooms in accordance with the recommendations of Newham’s forthcoming ‘Housing design needs study’. This study will consider the design needs of neurodivergent residents, residents with learning disabilities and residents on Newham’s housing waiting list. It will also seek to undertake engagement with residents whose access to housing is affected by these design needs. Please see the new wording in Policy H11.
Reg18-E-082	Resident	Reg18-E-082/045	Homes	H11 Housing Design Quality			2.e			<ul style="list-style-type: none"> Page.198 (Policy H11: Housing design). In reference to 2e, single aspect units facing north should not be permitted unless in exceptional circumstances. Single aspects have significant impact on mental health and wellbeing of their occupants especially during the winter periods. 	A change to this policy approach has not been made. We did not consider this change to be appropriate as this requirement is important to help ensure high quality living conditions within new dwellings. However, the implementation text for policy H11 now been amended to allow for specific circumstances where one or two-bedroom single aspect homes may be acceptable, namely where they are generously sized, shallow in plan and east or west facing.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H11 sets out requirements for the delivery of both adaptable and adapted homes suitable for wheelchair users. We have sought to require that social rent wheelchair adaptable homes are delivered as fully adapted homes, so they can be occupied by residents on our wheelchair housing waiting list without needing extensive further adaptations. We have also set out additional design quality considerations developers will need to make when designing adapted and adaptable homes for disabled residents.	There isn't enough housing for people with disability, many people become disabled during the period of their lifetime we need housing designed for life for every part of life.		7			H11 Housing Design Quality	Homes	Reg18-E-087/011	Resident	Reg18-E-087
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the space standards required by the draft Local Plan (H11.2.a) correspond with the minimum internal standards set out in the London Plan. While not directly comparable, the London Plan space standards are generally higher in terms of overall floorspace provision than the 1961 Parker Morris standards. Increased space standards for new homes can have a viability impact on new developments coming forward. We consider our new housing design policy (H11) and the 2021 London Plan strike the right balance between securing a spacious, high quality home while ensuring the viability of schemes isn't unduly impacted.	Most new build homes are now too small for active living. Parker Morris Space Standards should be specified as the minimum space and amenity standards for all new housing--not rabbit hutches -- and specified as such.		2.a			H11 Housing Design Quality	Homes	Reg18-E-098/024	Resident	Reg18-E-098

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-098	Resident	Reg18-E-098/042	Homes	H11 Housing Design Quality						Policies which encourage community safety, environmental improvements, greening, play facilities etc on housing land and more widely should be encouraged.	A change to this policy approach has not been made. We did not consider this change to be necessary as these requirements are addressed through a range of policies in the Local Plan including housing policies, design policies, climate emergency policies, green and water spaces policies.
Reg18-E-098	Resident	Reg18-E-098/047	Homes	H11 Housing Design Quality						The Plan should have specific policies that encourage programmes of Repair, Improvement and maintenance in the PRS. See above.	A change to this policy approach has not been made. We did not consider this change to be appropriate as in the draft Local Plan we have policies on purpose built rented accommodation, houses in multiple occupation and large-scale purpose-built shared living developments, which include quality standards new developments are required to meet. However, we do not have influence over dwelling houses that change to rented accommodation or historic lawful houses in multiple occupation, as these developments do not require planning permission. Separate to the Local Plan, our colleagues in Private Sector Housing are working to improve the standard of homes in the private rented sector, via our landlord licencing scheme.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as planning policies relevant to this issue don't distinguish between tenures. Please refer to the Design and Climate Emergency chapters of the Local Plan for policies on front gardens and crossovers.	These policies should encourage the re-instatement of front gardens/boundary walls and all future crossovers should be forbidden in the PRS using both Planning and Highways powers.					H11 Housing Design Quality	Homes	Reg18- E- 098/048	Resident	Reg18 -E-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H11 sets out requirements for the delivery of both adaptable and adapted homes suitable for wheelchair users. We have sought to require that social rent wheelchair adaptable homes are delivered as fully adapted homes, so they can be occupied by residents on our wheelchair housing waiting list without needing extensive further adaptations. We have also set out additional design quality considerations developers will need to make when designing adapted and adaptable homes for disabled residents.		3.13 7	7			H11 Housing Design Quality	Homes	Reg18- K- 037/006 c	Resident	Reg18 -K-037

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/064	Homes	H11 Housing Design Quality						[Change it] [I understand the need for more housing] but ASB from problem households is rife in Newham and ruins people's lives and communities. You must be very firm on ASB and enforce tenancy rules and I would like to see real clarity around that in the Local Plan. Where a household shows total contempt for their law abiding neighbours' right to enjoy their property in peace and get to sleep at a good time, there needs to be firm and decisive action taken against them. Newham is much too slow to deal with problem households.	The Local Plan addresses this topic through our homes policies, including quality standards that new developments are requirement to meet. However, it cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. Our colleagues can be contacted about anti-social behaviour issues related to housing, and can be contacted using the following link: https://www.newham.gov.uk/public-health-safety/anti-social-nuisance-behaviour .
Reg18-T-011	Resident	Reg18-T-011/014	Homes	H11 Housing Design Quality						[Keep it]	Support noted.
Reg18-T-019	Resident	Reg18-T-019/019	Homes	H11 Housing Design Quality						Need more inform	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-034	Resident	Reg18-T-034/041	Homes	H11 Housing Design Quality						[Add to it] Ensure good quality design of new developments and redevelopments.	Comment noted. The Local Plan seeks to address the quality of new homes through the various requirements set out in Policy H11.
Reg18-T-034	Resident	Reg18-T-034/042	Homes	H11 Housing Design Quality						[Add to it] New built and existing properties should be expected to have provision for rubbish and waste off the street so it doesn't impact others.	A change to this policy approach has not been made. We did not consider this change to be necessary as policy W3 (Waste management in developments) requires major residential developments to submit a Waste Management Plan that accords with the requirements of Newham's most up-to-date Waste Management development guidelines. These guidelines

Comment Response	require new developments to provide off-street waste management.
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Reg18 -T-034	Resident	Reg18- T- 034/043	Homes	H11 Housing Design Quality						[Add to it] Enforce planning regulations and ensure developers stick to plans.	Comment noted. Where developments don't have planning permission these cases will be investigated by the Council's Planning enforcement team.
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/044	Homes	H11 Housing Design Quality						[Add to it] Ensure plans decrease ASB, littering and waste.	<p>The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues:</p> <ul style="list-style-type: none"> - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal <p>Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter</p> <p>We have also provided the Waste team with your comments.</p>
Reg18-T-057	Resident	Reg18-T-057/037	Homes	H11 Housing Design Quality						[Add to it] E	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-074	Resident	Reg18-T-074/011	Homes	H11 Housing Design Quality						[Change it] Room could be bigger bath and shower.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H11 sets requirements for new dwellings to meet minimum space standards.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-082	Resident	Reg18-T-082/012	Homes	H11 Housing Design Quality						[Add to it] Good quality finish of houses needs to be done	A change to this policy approach has not been made. We did not consider this change to be necessary as policy H11 sets requirements for the design and internal layout of new homes. Requirements around the external finish of buildings is set out in the design chapter of the draft Local Plan.
Reg18-T-088	Resident	Reg18-T-088/021	Homes	H11 Housing Design Quality			7			[Change it] either build lift in stairs building doesn't matter either they are 2 stories or three or don't accommodate elderly, disable or learning difficulty person	<p>Comment noted. In order to address these issues we have proposed a new portfolio approach to delivering wheelchair adaptable or adapted homes in Policy H11 (Housing Design Quality).</p> <p>It is recognised that in some instances, for example areas of high flood risk, site constraints may preclude wheelchair adapted accommodation being delivered on the ground floor of a development and it may be too expensive for smaller developments to include and maintain a lift. Accordingly, the policy allows for the delivery of a portfolio approach in limited circumstances to help address this issue, in essence allowing for increased delivery of accessible homes (on the ground floor or with lifts) on some sites to make up for lower provision of accessible homes on another, less suitable sites.</p>
Reg18-T-103	Resident	Reg18-T-103/024	Homes	H11 Housing Design Quality						[Change it] This should be audited because it's terrible	Comment noted. This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording. Please see the new wording in Policy H11.
Reg18-T-105	Resident	Reg18-T-105/022	Homes	H11 Housing						[Keep it]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
				Design Quality							
Reg18-T-108	Resident	Reg18-T-108/010	Homes	H11 Housing Design Quality						[Change it] Improve the standards	Comment noted. This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording. Please see the new wording in Policy H11.
Reg18-T-126	Resident	Reg18-T-126/019	Homes	H11 Housing Design Quality						[Keep it]	Support noted.
Reg18-S-001	Shelter	Reg18-S-001/005	Homes	H11 Housing Design Quality			1.b			Support Housing design quality policy on ensuring homes have adequate ventilation	A change to this policy approach has not been made. We did not consider this change to be necessary as the Policy requirements in Policy CE2 Zero Carbon Development will mean that new homes are likely to have Mechanical Ventilation with Heat Recovery systems. "Active cooling" such as air conditioning is not supported in Policy CE5, with passive design principles such as building orientation, natural ventilation from windows and shading to minimise overheating.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-S-001	Shelter	Reg18-S-001/006	Homes	H11 Housing Design Quality						Lack of working lifts can be an issue in developments with only one lift.	<p>Comment noted. In order to address these issues we have proposed a new portfolio approach to delivering wheelchair adaptable or adapted homes in Policy H11 (Housing Design Quality).</p> <p>It is recognised that in some instances, for example areas of high flood risk, site constraints may preclude wheelchair adapted accommodation being delivered on the ground floor of a development and it may be too expensive for smaller developments to include and maintain a lift. Accordingly, the policy allows for the delivery of a portfolio approach in limited circumstances to help address this issue, in essence allowing for increased delivery of accessible homes (on the ground floor or with lifts) on some sites to make up for lower provision of accessible homes on another, less suitable sites.</p>
Reg18-S-001	Shelter	Reg18-S-001/008	Homes	H11 Housing Design Quality			3			<p>Need to design for people with disabilities or neurodiversity where disabilities are not physical (e.g. Autism). This is of particular relevance to new social housing. Need to consider:</p> <ul style="list-style-type: none"> - Need for separate kitchens - Window heights / opening / access points to open space - Storage for equipment - Cabinets should be placed higher - Sensory sensitivity – possibility to change lighting 	<p>This policy approach has now changed to incorporate a new policy clause that requires development referable to the Mayor of London to design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study'. This study will consider the design needs of neurodivergent residents, residents with learning disabilities and residents on Newham's housing waiting list. It will also seek to undertake engagement with residents whose access to housing is affected by these design needs. Please see the new wording in Policy H11.</p>

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-S-001	Shelter	Reg18-S-001/010	Homes	H11 Housing Design Quality			3			National Autistic Society could help with answering questions on what makes design good quality for autistic people.	This policy approach has now changed to incorporate a new policy clause that requires development referable to the Mayor of London to design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study'. This study will consider the design needs of neurodivergent residents, residents with learning disabilities and residents on Newham's housing waiting list. It will also seek to undertake engagement with residents whose access to housing is affected by these design needs. Please see the new wording in Policy H11.
Reg18-S-001	Shelter	Reg18-S-001/012	Homes	H11 Housing Design Quality			11			<p>Issues for residents waiting for adapted housing</p> <p>[- The wait list is long. People often living in overcrowded conditions]</p> <p>- Design needs to be sufficiently spacious</p> <p>- Lighting can be an issue if too bright and people have sensory issues.</p> <p>Acknowledged this could be more about rights to change social rented properties as a tenant.</p>	This policy approach has now changed to incorporate a new policy clause that requires development referable to the Mayor of London to design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study'. This study will consider the design needs of neurodivergent residents, residents with learning disabilities and residents on Newham's housing waiting list. It will also seek to undertake engagement with residents whose access to housing is affected by these design needs. Please see the new wording in Policy H11.

Reg18-S-001	Shelter	Reg18-S-001/012a	Homes	H11 Housing Design Quality			9			<p>Issues for residents waiting for adapted housing</p> <p>- The wait list is long. People often living in overcrowded conditions</p>	<p>The Local Plan addresses this topic through housing policies, particularly those relevant to affordable housing and the delivery of family housing. However, it cannot deliver the change you have requested, as our housing waiting list is managed by the Council's Housing team. We have provided them with your comments.</p> <p>The 37,000 households currently on the housing register is a reflection of the huge scale of housing need in Newham. Between 600 and 800 social-rented properties are let per year, which means that many of those households will never be allocated a council or social-rented property.</p> <p>The way in which social housing is allocated to individual households is set out in the Council's Allocations Policy. This sets out how households bidding for each property are prioritised by the acuteness of a household's housing need rather than simply how long a household has been waiting. This means that even households who have waited over ten or even twenty years may not be successful in bidding if there are households with a higher need. For this reason we encourage households to consider other options besides social-rented housing in Newham, such as looking for social or privately-rented housing in cheaper areas outside London if appropriate.</p> <p>Newham also has the highest rate of overcrowding nationally, with 21.5% of households living in overcrowded conditions. Due to the shortage of, and high cost of, larger homes in the private sector and lack of larger social-rented homes, many families are unable to move to larger homes. Although our planning policies are seeking to build more family-sized homes of all tenures, these will take time to deliver.</p>
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											<p>In the shorter term, we have commissioned some research into how the Council could mitigate some of the negative health and wellbeing impacts of overcrowding. This aims to improve the experience of living in an overcrowded household, especially for families with children. The research will report its findings in early 2024.</p> <p>We also changed our allocations policy in February 2022 to give greater priority to households who are severely overcrowded (by two or more bedrooms) if they have another housing need, for example medical or homelessness.</p>
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>	<p>The Berkeley Group proposed amendments to draft policy wording: 5. High-density developments, as defined in Policy D5, should incorporate at least one accessible communal amenity internal/sheltered space(s) of 50m2 for the first ten units and 1m2 for each additional unit, up to 200m2 net floorspace, <u>unless it can be demonstrated that other planning policy requirements preclude these standards being met and a suitable provision of compensatory publicly accessible open space is being provided on site.</u></p>		5			H11 Housing Design Quality	Homes	Reg18-E-136/379	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/118	Homes	H11 Housing Design Quality						Overall, the Berkeley Group supports the principle of delivering high quality housing design which Policy H11 seeks to achieve. This approach aligns with the Berkeley Group's own objectives to deliver high quality homes that strengthen communities and improve people's lives. The fact that the Berkeley Group has delivered 9,000 new homes across London and the South East in the last 7 years means it is well placed to provide new homes in and for the borough that will contribute to Newham's objectives. A design-led approach as a means of optimising site capacity (as set out in draft Policy D3 and Policy D3 of the London Plan) is dependent on delivering high quality developments and homes and this policy is supported in principle.	Support noted.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/119	Homes	H11 Housing Design Quality			1.a			The Berkeley Group do however have a number of specific comments to make on this draft policy which as currently drafted outline a number of specific requirements. These are set out below: Point 1 (a) requires all new development to be designed to enable internal reconfiguration and avoid irregular geometry that limits reconfiguration of internal layouts. A minimum of two alternative furniture layouts should be possible for each habitable room. This policy requirement is more akin to supplementary planning guidance.	This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/120	Homes	H11 Housing Design Quality			1.a			Furthermore, for many applications including specifically outline applications this level of detail [furniture layouts] is not always worked up at planning application stage and the requirement should therefore be removed. Proposed wording change: 1. All new housing development should be designed to: a. locate building structural elements to enable internal reconfiguration and avoid irregular geometry that limits reconfiguration of internal layouts. A minimum of two alternative furniture layouts should be possible for each habitable room; and	This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/121	Homes	H11 Housing Design Quality			1.b.iii			Point 1 (b) (iii) requires living areas and kitchen dining spaces to receive direct sunlight for at least two hours a day. The residential amenity with respect to daylight and sunlight levels is already assessed using the BRE standards and for this reason the Berkeley Group recommends the removal of this requirement. Proposed wording change: b. promote health and wellbeing of residents by providing good living and environmental conditions including high levels of natural daylight, sunlight, natural ventilation and individual climate controls, by: iii. ensuring living areas and kitchen dining spaces receive direct sunlight for at least two hours a day; and	This policy approach has now changed to remove this policy clause. Please see the new wording in Policy H11, which retains the requirement to maximise internal levels of daylight through orientation, articulation and incorporation of breaks in massing. The policy's implementation text also states that residential developments should seek to comply with the Building Research Establishment (BRE).

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/122	Homes	H11 Housing Design Quality			1.c			Point 1 (c) requires shared circulation areas, such as hallways and stairway landing areas, wide enough to accommodate informal social interaction and active uses such as play areas or seating. Whilst these spaces should be sufficient enough to encourage social interaction a requirement for these spaces to enable active uses such as play is not always possible and can be met in other parts of the development. This is further exacerbated by new requirements for second stair cores following recent proposed amendments to fire regulations. Proposed wording change: c. provide shared circulation areas, such as hallways and stairway landing areas, wide enough to accommodate informal social interaction and active uses such as play areas or seating.	This wording change has not been made. We did not consider this change to be necessary as this clause has now been fully deleted from the policy. This is due to the potential amenity and safety issues associated with the use of these spaces, particularly by children. It is considered the function this space can be met instead via private and public amenity spaces. Please see the new wording in policy H11.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/123	Homes	H11 Housing Design Quality			2.b			Point 2 (b) outlines very detailed guidance for conventional housing which again is guidance more typical of supplementary planning guidance and does not take account of site-specific circumstances. Further these types of design measures should be picked up by the Design Code for each development. Proposed wording change: 2. All new conventional housing should be designed to: a. meet the internal space standards of the London Plan (2021) as a minimum, as well as provide adequate external private open space (as set out in London Plan (2021) Guidance or subsequent updates); and b. minimise the number of private outdoor amenity spaces accessed from bedrooms in family-sized dwellings; and	This policy approach has now changed to apply this requirement to all new general needs housing. Please see the new wording in policy H11. The change you have suggested has not resulted in a change as we did not consider this change to be appropriate this requirement is important to help ensure high quality and safe private amenity spaces within dwellings.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/124	Homes	H11 Housing Design Quality			2.c			Point 2 (c) outlines very detailed guidance for conventional housing which again is guidance more typical of supplementary planning guidance and does not take account of site-specific circumstances. Further these types of design measures should be picked up by the Design Code for each development. Proposed wording change: c. locate any ground floor bedrooms to the rear of dwellings; and	This wording change has been made. Please see the new wording in policy H11, which removes this requirement. Additional clarification on the need to carefully consider defensible space where bedrooms are located on street facing facades at ground floor level has been added to the policy's implementation text.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				2.f			H11 Housing Design Quality	Homes	Reg18-E-136/125	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This wording change has not been made. We did not consider this change to be necessary as the wording of this policy requirement has now been amended. The policy wording has been amended to reflect that this approach to design can have positive impacts, including providing passive surveillance and adding visual interest to building facades. Please see the new wording in Policy H11, which seeks to avoid the design challenges associated with locating private amenity spaces on street-facing facades. The implementation policy also provides guidance that where dwellings would be sensitive to significant noise, air quality or visual impacts, homes should provide an alternative aspect, with private external amenity spaces located on the aspect with better environmental conditions.	Point 2 (f) outlines very detailed guidance for conventional housing which again is guidance more typical of supplementary planning guidance and does not take account of site-specific circumstances. Further these types of design measures should be picked up by the Design Code for each development. Proposed wording change: f. locate private amenity spaces away from major routes or <u>incorporate adequate defensible space</u> ; and									
	This wording change has been made. Please see the new wording in Policy H11, which removes this requirement.	Point 2 (g) outlines very detailed guidance for conventional housing which again is guidance more typical of supplementary planning guidance and does not take account of site-specific circumstances. Further these types of design measures should be picked up by the Design Code for each development. Proposed wording change: g. incorporate private winter gardens or adequately sheltered amenity space into apartments above seventh storey level.		2.g			H11 Housing Design Quality	Homes	Reg18-E-136/126	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/127	Homes	H11 Housing Design Quality			4			<p>Points 4 and 5 seek to ensure shared amenity spaces are incorporate and prescribes the areas for these spaces. External community amenity spaces are expected to be 50 sqm for the first ten units or private rooms and 1 sqm for each additional unit or private room and high density development should incorporate at least one accessible communal amenity internal/sheltered space(s) of 50 sqm for the first ten units and 1sqm for each additional unit, up to 200 sqm net floorspace. The Berkeley Group wish to see acknowledgement that site specific circumstances may preclude these standards from being met and in those instances communal amenity provision must be considered in the round, in the context of other amenity space being delivered on site as well as the overall quality of the development and public benefits being delivered. Proposed wording change: 4. Major housing developments should incorporate shared amenity spaces that foster social interaction and a sense of community. External communal amenity spaces should be designed to:</p> <p>a. provide 50m2 for the first ten units or private rooms (if not self-contained) and 1m2 for each additional unit or private room (if not self-contained) <u>unless it can be demonstrated that other planning policy requirements preclude these standards being met and a suitable provision of compensatory publicly accessible open space is being provided on site;</u></p>	This wording change has not been made. We did not consider this change to be appropriate as this requirement is an expectation on all major developments, and any deviation from this requirement will need to be robustly justified as part of a planning application.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/128	Homes	H11 Housing Design Quality			6.b			Point 6 (b) seeks to ensure affordable housing occupiers have access to any on-site services and facilities provided via a membership model, available to all residents, with access for residents living in affordable accommodation being of a comparable cost to using a Council facility. The Berkeley Group agree that all on-site services and facilities should be available to all however as noted this should be on a membership model basis as the inclusion of some services has implications for the service charge which is often a particular concern for Registered Providers. Proposed wording change: 6. Developments which include affordable housing should ensure: b. access to any on-site services and facilities are provided via a membership model, available to all residents, with access for residents living in affordable accommodation being of a comparable cost to using a Council facility, <u>subject to management considerations for Registered Providers.</u>	This policy approach has now changed to require these facilities to be of comparable cost of other facilities (private and Council-run) in the locality, and to clarify how the policy should be implemented. Costs should not be subsidised via residents' service charges; instead, these facilities should be run as a separate business, with the cost of accessing these facilities being kept as low as possible to allow access for all. Please see the new wording in the implementation text for H11.6.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5).</p> <p>The Metropolitan Police Service (run by the GLA), is also a consultee for the Local Plan and as part of decisions on major planning applications, and have dedicated designing-out-crime officers who are trained to conduct environmental visual audits to identify methods of making a place less attractive for criminal behaviour. Please also see responses we have provided to their comments on the draft Local Plan.</p> <p>However The Local Plan cannot deliver the change you have requested. The Council's Community Safety department regularly collect and review data around ASB in the borough, responding to hotspot locations through targeted and focused operations in conjunction with the Police and others partners. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.</p>	[Add] Better design in housing for safety					H11 Housing Design Quality	Homes	Reg18-As-001/035	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	Stratford East supports the provision of high-quality accessible communal amenity spaces in major developments to ensure a good quality of residential amenity.		4 and 5			H11 Housing Design Quality	Homes	Reg18-E-124/016	Stratford East London Partners LLP	Reg18-E-124

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/017	Homes	H11 Housing Design Quality			4 and 5			<p>The internal and external communal amenity space requirements set out in Parts 4 and 5 will be in addition to the Housing quality and standards required to be met by London Plan Policy D6. Whilst, it is common for communal amenity spaces to be provided in major housing developments, the type of provision and quantum is determined by site characteristics and location to public open space.</p> <p>These standards will be challenging to meet in highly accessible locations where sites tend to be more constrained and the London Plan Policy D3 seeks housing capacity to be optimised.</p> <p>Therefore, we recommend the Parts 4 and 5 of the policy are refined to require acceptable amounts of communal amenity space taking account of site characteristics and proximity to areas of public open space and parks.</p>	<p>This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p> <p>It is considered the requirement for external communal amenity space is required in addition to private amenity spaces as these spaces will serve different functions, and will be used by all residents of a development, including those with access to private gardens.</p>

Comment Response	Newham's Green and Waster Spaces Strategy shows the overall provision of publicly accessible space in Newham is considerably lower than our neighbouring boroughs, with a rate of just 0.71 hectares per 1,000 residents. All new major residential developments should be seeking to improve residents access to open space, and for this reason, we do not consider the proximity to existing open space sufficient justification to diverge from this policy requirements.
Comment	
Implementation	
Justification	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/020	Homes	H11 Housing Design Quality			6			Regarding Part 6, on-site facilities are not always provided at ground floor and can be provided in a single building within a wider development. Consequently, there are potential safety concerns that need to be considered where access to on-site facilities would also allow access to the private residential parts of the building.	Comment noted. We do not consider that tenants of affordable housing would pose a safety risk if accessing privately owned parts of a development.
Reg18-E-124	Stratford East London Partners LLP	Reg18-E-124/021	Homes	H11 Housing Design Quality			6.b			Furthermore, Stratford East feel that specifying rates based on Council facility costs is not a fair comparison, as Council facilities often benefit from subsidies that are not available for developers and therefore, unreasonable to apply in policy.	This policy approach has now changed to require these facilities to be of comparable cost of other facilities (private and Council-run) in the locality, and to clarify how the policy should be implemented. Costs should not be subsidised via residents' service charges; instead, these facilities should be run as a separate business, with the cost of accessing these facilities being kept as low as possible to allow access for all. Please see the new wording in the implementation text for H11.6.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/019	Homes	H11 Housing Design Quality						The draft Local Plan includes a series of highly prescriptive proposed requirements relating to the design/provision of housing and associated amenity space. This is principally contained in Draft Policy H11 . The hybrid planning application for Silvertown is supported by a Design Code which establishes design rules for the development of the site and future Reserved Matters Applications will need to demonstrate compliance with it. TSP has a general concern about the prescriptiveness of emerging policy acting as a barrier to a design-led approach which optimises density and maximises quality. TSP considers that these standards may be more appropriately directed to planning guidance rather than adopted policy. Specific comments in relation to Policy H11 and other policies which set prescriptive design standards is included at Appendix A .	Comment noted. This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording. Please see the new wording in Policy H11.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/081	Homes	H11 Housing Design Quality						[Appendix A] The proposed Housing Design Quality standards are generally supported, [...]	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/082	Homes	H11 Housing Design Quality						[Appendix A] however, there are proposed requirements which are highly prescriptive and have the potential to restrict the design-led approach to achieving high-quality design. The level of detail far exceeds that typically found in a policy and may be better suited to a supplementary planning guidance document. The following detailed representations are made:	Comment noted. This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording. Please see the new wording in Policy H11.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/083	Homes	H11 Housing Design Quality			1.a			[Appendix A] Part 1(a) – clarity is required on how ‘furniture layouts’ are to be calculated. The benefit of such a requirement is questioned provided that each habitable room can have a high-quality layout;	This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/084	Homes	H11 Housing Design Quality			1.b.iii			[Appendix A] Part 1(b)(iii) – the implications of requiring two hours of direct sunlight per day for all living areas and kitchen / dining spaces is queried and it is considered that such an onerous requirement may have significant implications for the optimisation of housing delivery. Clarity is also required on whether the proposed two-hour requirement is to be measured in the winter solstice or at another point in the year.	This policy approach has now changed to remove this policy clause. Please see the new wording in Policy H11, which retains the requirement to maximise internal levels of daylight through orientation, articulation and incorporation of breaks in massing. The policy’s implementation text also states that residential developments should seek to comply with the Building Research Establishment (BRE).

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Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/085	Homes	H11 Housing Design Quality			1.c			[Appendix A] Part 1(c) – clarity is required on how this proposed standard is to be measured. It would be beneficial to provide a minimum width.	A change to this policy approach has not been made. We did not consider this change to be necessary as this clause has now been fully deleted from the policy. This is due to the potential amenity and safety issues associated with the use of these spaces, particularly by children. It is considered the function this space can be met instead via private and public amenity spaces. Please see the new wording in policy H11.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/086	Homes	H11 Housing Design Quality			2.c			[Appendix A] Part 2(c) – there may be situations where street facing ground floor bedrooms are acceptable depending on the nature of the street and the extent of proposed setbacks.	This policy approach has now changed due to this requirement being too prescriptive. Please see the new wording in policy H11, which removes this requirement. Additional clarification on the need to carefully consider defensible space where bedrooms are located on street facing facades at ground floor level has been added to the policy's implementation text.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/087	Homes	H11 Housing Design Quality			2.g			[Appendix A] Part 2(g) – rationale needs to be provided for avoiding projecting balconies about seventh floor. It is considered that the acceptability of different balcony types is site-specific.	This policy approach has now changed due to this requirement being too prescriptive and the need to consider the suitability of this requirement on a case-by-case basis. Please see the new wording in Policy H11, which removes this requirement.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/088	Homes	H11 Housing Design Quality			4 to 5			[Appendix A] Parts 4 and 5 – while the proposals for Silvertown include shared amenity spaces, a prescriptive area-based requirement raises concerns and could have implications for the achievability of optimised high density development. A blanket approach is not considered to be correct given other factors such as the proximity to open spaces have a bearing on the amount of communal space that is appropriate. For multi-building developments	This policy approach has now changed to incorporate additional flexibility around the provision of both internal and external communal amenity spaces. Please see the new wording in Policy H11, which now only sets expectations for the provision of external communal amenity space. However, the implementation text clarifies that internal communal amenity space may be delivered in place of a small proportion of communal

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	<p>external amenity space where this would improve the viability of a scheme and not result in undue increases in service charges.</p> <p>We have retained requirements in the policy around the expected level of external communal greenspace provision, in line with the recommendations of Newham's Characterisation Study. Furthermore, the provision of conveniently located green and open spaces for social interaction, play, relaxation and physical activity is a requirement of the design-led approach set out within the London Plan's policy D3 and Newham's Site Allocation and Housing Trajectory Methodology. We consider this policy helps to provide clarity on Newham's expectation for the provision of this space.</p>	<p>such as Silvertown, clarity is sought on how to apply the proposed 200sqm cap set out in Part 5. Applying it to each individual residential building would be onerous.</p>									
	<p>Comment noted. This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording. Please see the new wording in Policy H11.</p>	<p>Draft Policy H11: Housing Design Quality</p> <p>Many of the policy requirements set out in draft Policy H11 go beyond the scope of the good design principles set out in the GLA Housing Design Guide, which TTLP consider to be a robust way of ensuring that well designed homes are delivered across London. Some of the requirements are considered to be potentially onerous, and the reasons behind them unclear. We are concerned that some requirements have the potential to create viability challenges and a significant amount of detail to be provided in planning applications.</p>					H11 Housing Design Quality	Homes	Reg18-E-080/034	Transport Trading Limited Properties Limited	Reg18-E-080

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Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/035	Homes	H11 Housing Design Quality			1.a			We request that the points below in particular are reviewed to ensure that the policy requirements are proportionate and reasonable: - H11 Part 1.a. requirement to locate building structural elements to enable internal reconfiguration and avoid irregular geometry that limits reconfiguration of internal layouts with a minimum of two alternative furniture layouts should be possible for each habitable room;	This policy approach has now changed due to this requirement being too prescriptive and potentially onerous to demonstrate. Please see the new wording in policy H11, which removes the requirement to demonstrate a minimum of two alternative furniture layouts for each habitable room unless requested at application stage.
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/036	Homes	H11 Housing Design Quality			1.c			[We request that the points below in particular are reviewed to ensure that the policy requirements are proportionate and reasonable:] - H11 Part 1.c. requirement to provide shared circulation areas, such as hallways and stairway landing areas, wide enough to accommodate informal social interaction and active uses such as play areas or seating.	A change to this policy approach has not been made. We did not consider this change to be necessary as this clause has now been fully deleted from the policy. This is due to the potential amenity and safety issues associated with the use of these spaces, particularly by children. It is considered the function this space can be met instead via private and public amenity spaces. Please see the new wording in policy H11.
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/037	Homes	H11 Housing Design Quality			2.b			[We request that the points below in particular are reviewed to ensure that the policy requirements are proportionate and reasonable:] - H11 Part 2.b. requirement to minimise the number of private outdoor amenity spaces accessed from bedrooms in family-sized dwellings.	This policy approach has now changed to apply this requirement to all new general needs housing. Please see the new wording in policy H11. The change you have suggested has not resulted in a change as we did not consider this change to be appropriate this requirement is important to help ensure high quality and safe private amenity spaces within dwellings.

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Reg18-E-119	Unite Group plc	Reg18-E-119/023	Homes	H11 Housing Design Quality			8			<p>Part 8 states:</p> <p>8. Purpose-built student accommodation, LargeScale Purpose-Built Shared Living and housing for older people should provide ten per cent of private rooms as wheelchair accessible accommodation, including access to a wheelchair-accessible wet room.</p> <p>Unite would object to this policy requirement on basis that:</p> <ul style="list-style-type: none"> • The requirements for conventional residential accommodation, should not be applied to student housing as, in reality, the typical demand from students per annum falls significantly below the 10% mark. This is a steady and consistent trend as evidenced by Unite's longer term experience. 	<p>This policy approach has now changed due to recently published GLA guidance 'Wheelchair Accessible and Adaptable Student Accommodation ' (November 2022}.</p> <p>Please see the new wording in policy H11.9. The new wording reflects the approach set out in the aforementioned GLA guidance.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as it does not accord with the London Plan policy approach.</p>
Reg18-E-119	Unite Group plc	Reg18-E-119/024	Homes	H11 Housing Design Quality			8			<ul style="list-style-type: none"> • The London Plan (Policy D7) clarifies that the 10% requirement for wheelchair accessible rooms relates only to dwellings which are created via works to which Part M volume 1 of the Building Regulations applies – i.e., to new build dwellings. PBSA developments do not constitute dwellings and therefore the 10% requirement does not apply to these developments. This was confirmed within the Inspector's report to the London Plan. On this basis, the 10% requirement proposed by draft policy H11 is in fact in conflict with the London Plan. 	<p>This policy approach has now changed due to recently published GLA guidance 'Wheelchair Accessible and Adaptable Student Accommodation ' (November 2022}.</p> <p>Please see the new wording in policy H11.9. The new wording reflects the approach set out in the aforementioned GLA guidance.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as it does not accord with the London Plan policy approach.</p>

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	<p>This policy approach has now changed due to recently published GLA guidance 'Wheelchair Accessible and Adaptable Student Accommodation ' (November 2022).</p> <p>Please see the new wording in policy H11.9. The new wording reflects the approach set out in the aforementioned GLA guidance.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as it does not accord with the London Plan policy approach.</p>	<p>• Indeed, Unite have over 117 PBSA properties across the UK with 32 buildings in the London portfolio. Of these c.9,415 bedrooms, they have provision for 528 students that may need a wheelchair room. This is over 5.61% of the total London rooms. Over the last 5 years, Unite have provided 41 students with these rooms. In the current 2022/23 academic year, Unite had 6 students in need of wheelchair sized rooms out of an approximate total of c.9500 bedrooms. This equates to a 0.06% take up and thus demonstrates the exceptionally low need for accessible bedrooms.</p>		8			H11 Housing Design Quality	Homes	Reg18-E-119/025	Unite Group plc	Reg18-E-119
	<p>This policy approach has now changed due to recently published GLA guidance 'Wheelchair Accessible and Adaptable Student Accommodation ' (November 2022).</p> <p>Please see the new wording in policy H11.9. The new wording reflects the approach set out in the aforementioned GLA guidance.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as it does not accord with the London Plan policy approach.</p>	<p>• In addition, and following Unite's participation in the other Local Plan processes, further London Boroughs have followed that of the London Plan. This includes Tower Hamlets and Southwark which have both reduced the requirement from 10% (as originally proposed) to 5% of student rooms to be provided as accessible.</p>		8			H11 Housing Design Quality	Homes	Reg18-E-119/026	Unite Group plc	Reg18-E-119

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Reg18-E-119	Unite Group plc	Reg18-E-119/027	Homes	H11 Housing Design Quality			8			<ul style="list-style-type: none"> In any case, Unite operate a policy of meeting the needs of an individual user and not applying a one size fits all policy. Indeed, should individual bedrooms need to be adapted; this can be done quickly and relatively easily to meet requirements. Unite have undertaken such additional alterations in discussion with the end user and provided a bespoke solution to a student's needs. 	<p>This policy approach has now changed due to recently published GLA guidance 'Wheelchair Accessible and Adaptable Student Accommodation ' (November 2022).</p> <p>Please see the new wording in policy H11.9. The new wording reflects the approach set out in the aforementioned GLA guidance.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as it does not accord with the London Plan policy approach.</p>
Reg18-E-119	Unite Group plc	Reg18-E-119/028	Homes	H11 Housing Design Quality			8			<ul style="list-style-type: none"> Notwithstanding recent issue of GLA guidance in relation to wheelchair requirement, this relates to visitor accommodation (Policy E10). Visitor accommodation is clearly a very different building design and model to purpose-built student accommodation. This is however a practice note and is not adopted policy. 	<p>This policy approach has now changed due to recently published GLA guidance 'Wheelchair Accessible and Adaptable Student Accommodation ' (November 2022).</p> <p>Please see the new wording in policy H11.9. The new wording reflects the approach set out in the aforementioned GLA guidance.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as it does not accord with the London Plan policy approach.</p>

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	<p>This policy approach has now changed due to recently published GLA guidance 'Wheelchair Accessible and Adaptable Student Accommodation ' (November 2022}.</p> <p>Please see the new wording in policy H11.9. The new wording reflects the approach set out in the aforementioned GLA guidance.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as it does not accord with the London Plan policy approach.</p>	<p>Recommendation: The 10% requirement should be removed, and accessible requirements should instead defer to building regulation requirements of 1% fitted out with a further 4% adaptable.</p>		8			H11 Housing Design Quality	Homes	Reg18-E-119/029	Unite Group plc	Reg18-E-119

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Reg18-E-076	Watkins Jones Group PLC	Reg18-E-076/017	Homes	H11 Housing Design Quality			3.f.ii			<p>WJG provides comments on two other policies: Co-Living Design Standards</p> <p>Policy H11 of the draft Local Plan states that bedrooms within co-living developments should be between 27 sq. m and 32 sq. m. This does not align with the approach advocated by the GLA within the draft Large Scale Purpose Built Shared Living SPG (2022). The Council provides no justification within the draft Local Plan or the evidence bases for this policy (namely the SHMA and the Characterisation Study (2022)) as to why the room sizes differ from those detailed within the GLA's SPG. Moreover, the GLA has provided clear justification as to why it has selected these room sizes (i.e. in order that they are functional but are not undersized Class C3 units).</p> <p>Given the absence of evidence to support its approach, WJG requests that the Council adopts the approach used by the GLA.</p>	<p>This policy approach has now changed to more closely align with the standards set out within the GLA's Large-scale Purpose-built Shared Living LPG. Please see the new wording in Policy H11.</p>

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Reg18-E-076	Watkins Jones Group PLC	Reg18-E-076/018	Homes	H11 Housing Design Quality					Table 13	<p>BTR Design Standards</p> <p>It is not clear within Policy H11 of the draft Local Plan as to which criteria should be applied to BTR developments. It is suggested that Table 13 includes an additional column to cover this. The criteria should generally replicate those for general needs housing, although it is noted that some criteria are not relevant for BTR developments.</p> <p>WJG suggests that:</p> <ul style="list-style-type: none"> · Criteria 1, 2, 4, 6, 7 and 11 are applicable to BTR developments. · Criteria 3, 8 and 9 and 10 are not applicable to BTR developments. Policy H5 of the draft Local Plan clarifies that the affordable private rent levels within BTR developments should be equivalent to London Affordable Rent and London Living Rent, meaning that criteria 9 is not relevant. · Criteria 5 is relevant to BTR developments, although the 200 sq. m limit on internal communal/ amenity space should not apply. Large communal/ amenity spaces are provided as part of these developments. 	<p>This wording change has not been made. We did not consider this change to be necessary as build to rent accommodation should be considered under 'General needs housing' under the table. While we acknowledge that build to rent developments won't always deliver social rent dwellings or be part of a portfolio approach, keeping this form of housing under general needs accommodation means policy requirements are sufficiently flexible to respond to these scenarios if they are brought forward under a planning application.</p>
Reg18-E-076	Watkins Jones Group PLC	Reg18-E-076/024	Homes	H11 Housing Design Quality						<p>Policy H11 'Co-Living Design Standards' – the Council provides suggested room sizes for co-living, different from those detailed by the GLA. No evidence is provided by the Council to justify a different approach to the GLA.</p>	<p>This policy approach has now changed to more closely align with the standards set out within the GLA's Large-scale Purpose-built Shared Living LPG. Please see the new wording in Policy H11.</p>

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	This wording change has not been made. We did not consider this change to be necessary as build to rent accommodation should be considered under 'General needs housing' under the table. While we acknowledge that build to rent developments won't always deliver social rent dwellings or be part of a portfolio approach, keeping this form of housing under general needs accommodation means policy requirements are sufficiently flexible to respond to these scenarios if they are brought forward under a planning application.	Policy H11 'BTR Design Standards' – Table 13 should be updated to state which of the criteria are applicable to BTR developments.					H11 Housing Design Quality	Homes	Reg18-E-076/025	Watkins Jones Group PLC	Reg18-E-076