

# **Newham Draft Submission Local Plan**

## **Site Allocation and Housing Trajectory Methodology Note**

**June 2025**

## Contents

1. Introduction .....	2
2. Site Allocation Methodology.....	3
2.1. Introduction .....	3
2.2. Policy context.....	3
2.3. Methodology.....	7
2.4. Stage 1: Site identification .....	7
2.5. Stage 2: Site Assessment: .....	9
2.6. Stage 2a: Initial Sifting: .....	9
2.7. Stage 2b: Site Assessment .....	15
2.8. Landowner Engagement.....	18
2.9. Land use selection and infrastructure requirements .....	18
2.10. Stage 3: Site Selection .....	20
3. Site capacity testing .....	22
3.1. Introduction .....	22
3.2. Methodology.....	22
3.3. Site analysis.....	24
3.4. Design vision .....	25
3.5. Design parameters.....	25
3.6. Residential Building Types .....	26
3.7. Assumed dwelling mix & tenure.....	27
4. Housing Trajectory Methodology .....	29
4.1. Introduction .....	29
4.2. Sites that are included in the Housing Trajectory .....	30
4.3. Small sites .....	32
4.4. Range trajectory .....	33
4.5. Methodology for site phasing.....	34
4.6. 5 year land supply (London Plan Housing Target) .....	36
4.7. Shortfall against London Plan 2021 target .....	38
4.8. Managing the shortfall.....	39
4.9. Optimising housing delivery .....	44

## 1. Introduction

- 1.1. This Site Allocation and Housing Trajectory Methodology Note sets out the methodology used for the identification, assessment and allocation of sites in Section 4 of the Draft Submission Newham Local Plan. It sets out how capacity testing was undertaken to inform both the site allocations and the housing trajectory for both Regulation 18 and Regulation 19 versions of the Draft Newham Local Plan. It also sets out the position on the Draft Submission Local Plan housing trajectory and 5 year housing land supply.
- 1.2. This note should be read alongside the site allocations in Section 4 of the Draft Submission Newham Local Plan and Local Plan policy H1.

## 2. Site Allocation Methodology

### 2.1. Introduction

- 2.1.1. This section sets out the methodology used for identifying, assessing and allocating sites in the Draft Submission Local Plan. It provides an overview of the policy context for allocating sites and the assessment undertaken to identify land uses for different sites.

### 2.2. Policy context

#### *National policy and guidance*

- 2.2.1. The National Planning Policy Framework 2023 (NPPF)<sup>1</sup> requires Local Plans to promote a sustainable pattern of development that seeks to meet the development needs of their area and, as a minimum, provide for objectively assessed needs for housing and other uses. The NPPF (paragraph 20) requires that Local Plan make sufficient provision for:
- Housing (including affordable housing), employment, retail, leisure and other commercial development;
  - infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - community facilities, such as health, education and cultural infrastructure;
  - conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 2.2.2. With regards to housing, the NPPF 2023 requires that the Local Plan should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address the objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This includes planning for and allocating sufficient sites to deliver the strategic priorities of the area, except where these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies (paragraph 23).
- 2.2.3. The Council is required (paragraph 69) to have a clear understanding of the land available for housing in the borough and to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. The Local Plan should identify a supply of specific, deliverable sites for five years following the intended date of

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<sup>1</sup> The Plan will be examined under the 2023 version of the NPPF, as per the transitional arrangements set out in paragraph 234 of the December 2024 NPPF. Therefore, references in this document refer to the 2023 version of the NPPF.

adoption and specific, developable sites or broad locations for years 6 – 10 and, where possible, for years 11 – 15 of the plan.

2.2.4. In addition to housing, the NPPF 2023 requires the Local Plan to:

- set criteria, or identify strategic sites, for local and inward investment to match the economic vision and strategy and to meet anticipated needs over the plan period (paragraph 86);
- allocate a range of suitable sites in town centres to meet the scale and type of development needed for retail, leisure, officer and other main town centre uses (paragraph90);
- plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) (paragraph97);
- take a proactive, positive and collaborative approach to ensuring a sufficient choice of school places is available to meet the needs of existing and new communities (paragraph99);
- seek to accommodate the need for open space, sport and recreational provision (paragraph102);
- identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development (paragraph110);
- support development that makes efficient use of land, taking into account:
  - the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
  - local market conditions and viability;
  - the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
  - the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change;
  - the importance of securing well-designed and beautiful, attractive and healthy places (paragraph 128).
- at the most appropriate level, set out a clear design vision and expectations so that applicants have as much certainty as possible about what is likely to be acceptable (paragraph132);
- take a sequential, risk-based approach to the location of development, taking into account all sources of flood risk, and the current and future impacts of climate change (paragraph167); and
- prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability (paragraph180).

2.2.5. The Planning Practice Guidance (001 Reference ID: 3-001-20190722) sets out that an assessment of land availability can be used to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. It does not determine whether a site should be allocated for development but provides information on the range of sites which are available to meet the council's needs. The assessment should:

- identify sites and broad locations with potential for development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability)

#### *Regional policy and guidance*

2.2.6. The London Plan 2021 (policy GG2) requires the best use of land by through:

- enabling development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, sites within and on the edge of town centres, as well as utilising small sites;
- prioritising sites which are well-connected by existing or planned public transport;
- proactively exploring the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling
- applying a design-led approach to determine the optimum development capacity of sites
- understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character;
- protecting and enhancing London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible;
- planning for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth; and
- maximising opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.

2.2.7. The London Plan 2021 (policy D1) also requires boroughs to follow the design-led approach to establish optimised site capacities for site allocations and boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be

provided for different uses. Optimising site capacity is defined (policy D3) as ensuring that development is of the most appropriate form and land use for the site and the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.

- 2.2.8. In February 2022 the GLA published the draft Optimising Site Capacity: A Design-led Approach London Plan Guidance. The final document was published in August 2023. This guidance sets out the process of setting site-specific design parameters and codes for development sites and should be used to determine the most appropriate form of development on a site.

#### *Local policy and guidance*

- 2.2.9. The Newham Local Plan Refresh is a tool to deliver the Council's core strategies. These include:

- Building a Fairer Newham: Corporate Plan 2022 – 2026
- Building Newham's Creative Future (2022)
- The Newham Young People's Charter (2022)
- Towards a Better Newham: COVID-19 Recovery and Reorientation Strategy (2021)
- Tackling Racism, Inequality and Disproportionality (2021)
- Just Transition Plan (2024) 50 steps to a Healthier Newham (2024)
- Social Integration Strategy (2020)

- 2.2.10. Building a Fairer Newham 2022 underpins the objectives and policies in the Draft Submission Draft Local Plan and all development in the borough is expected to support and contribute to the delivery of these objectives:

- A healthier Newham and ageing well;
- An inclusive economy to support people in these hard times;
- People-friendly neighbourhoods with green and clean streets;
- Safer Newham where no-one feels at risk of harm;
- Homes for residents;
- Supporting young people to have the best start in life and reach their potential; and
- People powered Newham and widening participation in the life of the borough and the work the Council does

- 2.2.11. The approach to considering the appropriate approach to site allocations, including the proposed uses and capacity testing, incorporated the delivery of these objectives, including delivering 15 minute neighbourhood principles, increasing access to open space and healthy food environments, maintaining space for businesses and increasing access to public facilities.

## 2.3. Methodology

- 2.3.1. The approach to site allocations in the Local Plan Refresh has followed the guidance in the NPPG (see paragraph 2.2.5). Stages one and two identified and assessed sites' development potential by assessing their suitability, availability and achievability. This assessment was used during stage 3 to make a decision on whether a site should be allocated in the draft Local Plan and for which uses. Sites were then subject to capacity testing. This capacity testing informed the housing trajectory and the drafting of design principles for the site allocations at stage 4 of the process. This is set out in Figure 1 and set out in more detail in the subsequent sections of this methodology note. Further detail on the capacity testing is set out in Chapter 3 and on the housing trajectory in Chapter 4.
- 2.3.2. Stages 1 – 4 predominantly took place during the preparation of the Draft Local Plan (Regulation 18). However, further sites were submitted during the Regulation 18 consultation and these were subject to stages 2 - 4 where relevant. Revised capacity testing also took place on some existing site allocations. Further detail is set out in Chapter 2 and Chapter 3.

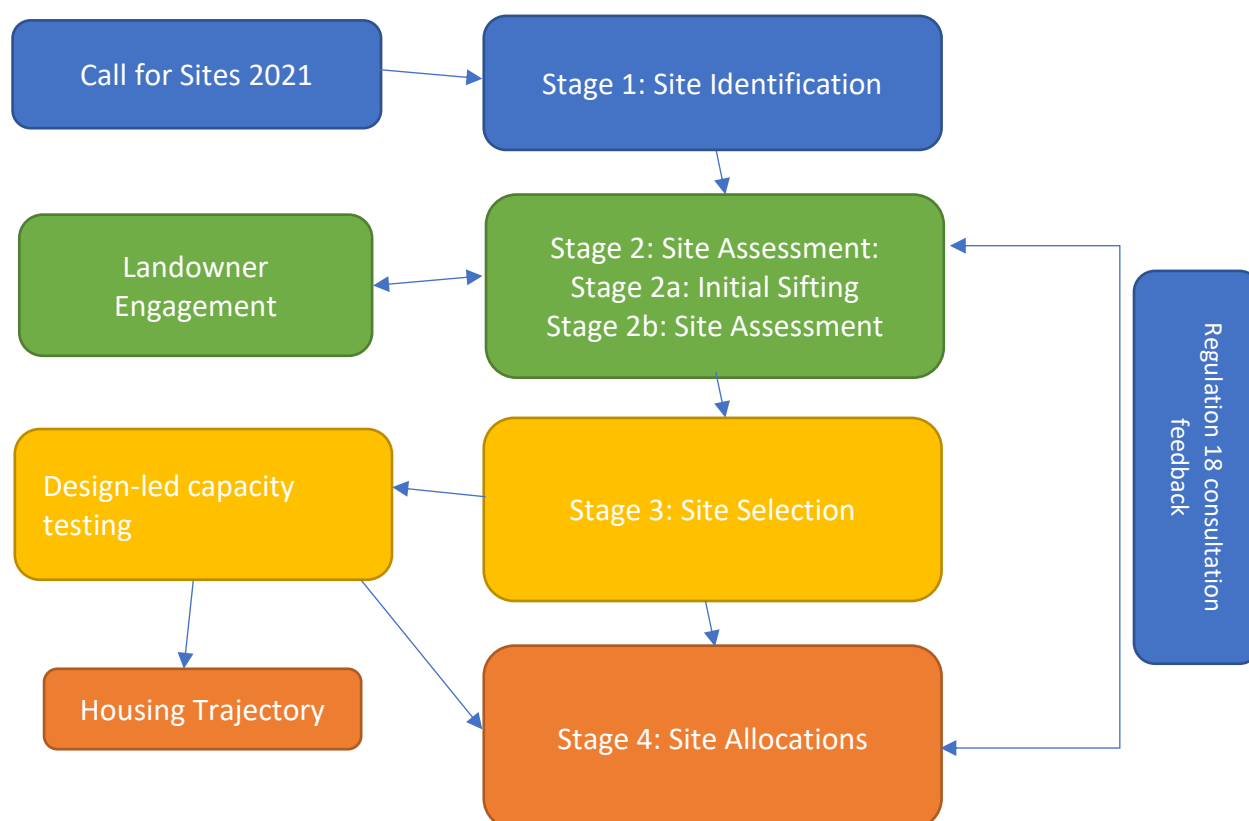


Figure 1 Site Allocation Process

## 2.4. Stage 1: Site identification



- 2.4.1. The first stage of the process was the site identification process. This brought together a long list of approximately 380 potential sites from a range of sources. When duplicate sites were removed this left approximately 300 sites to be sifted. The sources for these sites are set out in Table 1.

*Table 1 Sources of sites*

Source	Explanation
Call for Sites	Sites were submitted via a Call for Sites exercise which took place in October – December 2021 alongside the Issues and Options Local Plan consultation. It provided an opportunity for members of the public, developers and landowners to submit sites for consideration. 90 sites were submitted during this exercise.
Site Allocations in the adopted Newham Local Plan.	Newham Local Plan 2018 includes strategic and non-strategic site allocations. These were added to the long list of potential sites so their delivery to date could be assessed during Stage Two.
Site Allocations in the adopted LLDC Local Plan.	The LLDC Local Plan 2020 includes some site allocations that are in the Newham boundary. These were added to the long list of potential sites so their delivery to date and likely delivery prior to the end of 2024 (the LLDC transition deadline) could be assessed during Stage Two.
London Strategic Housing Land Availability Assessment 2017	The London Strategic Housing Land Availability Assessment (SHLAA) determines the quantity and suitability of land potentially available for housing as part of the preparation of the London Plan. This exercise was last completed in 2017 to inform the London Plan 2021. Sites categorised as ‘low probability’ and ‘excluded’ were added to the long list of potential sites so any change of status which meant they were now available or suitable could be assessed during Stage Two.
Brownfield Land Register	To identify any further available sites that are not allocated in the adopted Local Plan and have not yet been delivered.
Current planning applications and pre-applications	To identify any known pre-applications or planning applications which are not already allocated in the Local Plan and where a site allocation may benefit delivery of the site.
Evidence base documents	Sites identified through evidence base such as the Newham Employment Land Review or the East London Joint Waste Plan evidence base.

Other sources of sites	Any other known sites via council teams' intelligence.
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- 2.4.2. A further 21 sites were submitted during the Regulation 18 consultation. This included sites submitted by residents as well as from landowners and developers. 12 of these sites had already been considered as part of the preparation of the Regulation 18 version of the Local Plan. This meant that 9 sites needed to undergo the Stage 2 assessment stage.

## 2.5. Stage 2: Site Assessment:

- 2.5.1. The site sifting stage took place in two stages. The first stage was the initial sifting of sites and the second stage was a detailed assessment of sites.

## 2.6. Stage 2a: Initial Sifting:

- 2.6.1. The purpose of this stage was to make an initial judgement on whether a site is suitable, available and achievable for housing and economic development over the plan period and whether the site should be taken forward for a more detailed site assessment. It was a desk-top exercise to identify any 'showstoppers' and whether these could be mitigated as well as to identify any constraints that need to be considered further during the more detailed assessment.
- 2.6.2. Table 2 sets out the criteria used, the considerations and the assessment undertaken. This assessment resulted in one of the following conclusions:
- This site is suitable, available and achievable. Site is taken forward.
  - This site is potentially suitable, available and achievable. Site is taken forward.
  - This site is not suitable, available or achievable. Site not taken forward.

*Table 2 Site sifting criteria*

Criteria	Considerations	Assessment
<b>Suitability</b>		
Site size	Is the site smaller than 0.25ha?	<p>Sites smaller than 0.25ha taken forward where it is considered an allocation is necessary to achieve the vision for the neighbourhood. Factors considered:</p> <ul style="list-style-type: none"> <li>• Is it the only developable site in the neighbourhood?</li> <li>• Could it help deliver the vision for the neighbourhood?</li> </ul>

Criteria	Considerations	Assessment
		<ul style="list-style-type: none"> <li>• Could it help overcome a key challenge for the neighbourhood?</li> </ul> <p>Small sites are defined as being smaller than 0.25ha by the London Plan (policy H2). Small sites have a role to play in meeting Newham's housing needs, meeting targets on the number of sites delivered on small sites and spreading the benefits of growth across all of Newham's 17 neighbourhoods.</p>
<i>Environmental</i>		
Open space	Is the site Metropolitan Green Belt, Metropolitan Open Land or Protected Green Space? Is the site in an area of open space deficiency?	<p>Sites designated as Metropolitan Green Belt, Metropolitan Open Land or protected green space are not taken forward. Some sites include open space where it is considered the impact on open space could be mitigated and the site can deliver open space in line with the Plan's policy objectives.</p> <p>This is consistent with national, London Plan and existing and emerging Local Plan policies to protect open space.</p>
Trees	Does the site have protected trees on the site?	<p>Sites where the impact on protected trees on the site pose a significant constraint to the site, which cannot be mitigated, are not taken forward.</p> <p>This is consistent with national, London Plan and existing and emerging Local Plan policies to protect trees because of their contribution to</p>

Criteria	Considerations	Assessment
		character of neighbourhoods and to protect green infrastructure.
Air quality	Is the site in one of the borough's five Air Quality Focus Areas? Is the site in an area exceeding air quality limits?	<p>Identify whether site is in air quality focus area and/or source of air pollution and implications for uses and mitigation.</p> <p>This is consistent with national, London Plan and existing and emerging Local Plan policies to mitigate the impacts of poor air quality, particularly on vulnerable users, and to identify opportunities to improve air quality.</p>
Other sources of pollution	Does the site experience other forms of pollution such as noise or smell?	<p>Identify source of pollution and implications for uses and mitigation.</p> <p>This is consistent with national, London Plan, existing and emerging Local Plan to mitigate the impact of source of pollution on residents and users, including through the agent of change principle.</p>
Flood Risk	Is the site in Flood Zone 2 or 3? Is the site at risk from other sources of flooding? Are there historic flooding issues on this site?	<p>Identify whether source of flood risk and/or historic flooding issues and implications for uses and mitigation.</p> <p>This is consistent with the national, London Plan and existing and emerging policies to take a sequential approach to flood risk and ensure appropriate uses are located on sites at risk of flooding, taking into account their flood risk vulnerability category in the NPPF.</p>
Biodiversity	Is the site a Site of Importance for Nature Conservation?	Sites designated wholly as a Site of Importance for Nature Conservation

Criteria	Considerations	Assessment
		<p>are not take forward due to the impact on species and habitats.</p> <p>This is consistent with the national, London Plan and existing and emerging policies to protect Sites of Importance for Nature Conservation and to avoid harm to protected or priority species and habitats.</p>
Contamination	Does the site have issues of land contamination from previous uses?	<p>Identify whether source of contamination and implications for uses and mitigation. Consideration should be given to viability and cost implications of mitigating contamination.</p> <p>This is consistent with the national, London Plan and existing and emerging policies to mitigate historic contamination.</p>
<i>Design/heritage</i>		
Heritage	Does the site include heritage assets? Is the site in a conservation area or adjacent to heritage assets?	<p>Identify heritage designation or asset. Consideration of potential harm to asset and implications for uses, layout and mitigation.</p> <p>This is consistent with the national, London Plan and existing and emerging policies to conserve and enhance the historic environment.</p>
<i>Alternative designations</i>		
Industrial land	Is the site designated industrial or employment land?	<p>Designated industrial or employment land not identified suitable for mixed-use (Strategic Industrial Land and Local Industrial Land) are not taken forward. Other sites to be assessed against the findings of the Employment Land Review.</p>

Criteria	Considerations	Assessment
		This is consistent with the protection of industrial land in both the London Plan and existing and emerging Local Plan policies.
Waste	Is the site a designated waste sites?	<p>Waste designation to be identified. The safeguarding of waste sites will be considered through the update to the East London Joint Waste Plan rather than taken forward through the site allocation process at this stage.</p> <p>This is consistent with the protection of waste sites in both the London Plan, East London Waste Plan and existing and emerging Local Plan policies.</p>
Infrastructure	Does the site include strategic infrastructure such as transport, public safety (e.g. fire or police stations) utilities or flood defences? Is the site safeguarded for strategic infrastructure? Does the site include any community facilities as defined by the Local Plan?	<p>Sites including strategic infrastructure in active use or safeguarded for such uses are not to be taken forward unless the site is part of an agreed disposal strategy or feasible colocation is proposed. Community facilities to be considered where they can be re-provided as part of mixed-use development.</p> <p>This is consistent with the national, London Plan and existing and emerging Local Plan policies on protecting strategic infrastructure and community facilities.</p>
<i>Transport</i>		
Public Transport Accessibility	What is the site's current PTAL and what is the site's future (2031) PTAL rating?	Identify site's current and future PTAL rating, including any variations in PTAL across the site. This is consistent with the national, London Plan and existing and emerging Local Plan policies on

Criteria	Considerations	Assessment
		directing development to the most accessible locations.
Highways	Would development on this site cause unacceptable impact on highway safety or significant impact on the transport network (in terms of capacity or congestion)? Can safe and suitable access be achieved for all users?	Identification of potential highways or transport network impacts, informed by the Sustainable Transport Strategy.
<b>Availability</b>		
Availability	<p>Is the site considered available for development during the plan period? Do we have information that the landowner has intentions to develop the site? Are there any known land ownership or legal issues that would prevent the site from coming forward?</p> <p>For existing site allocations this includes an assessment of whether the site has been delivered, has commenced, whether there are any known constraints preventing the site coming forward and whether it is still likely to come forward during the plan period.</p>	If a site was submitted via the Call for Sites process or is going through the pre-application or application process it is considered available. Existing site allocations are not taken forward if they have been fully delivered. Identify whether further land owner engagement is needed to assess availability if site has not yet been delivered and/or we do not have any information on landowner's aspirations. Further information about landowner engagement is set out in section 2.8.
<b>Achievability</b>		
Achievability	Is there a reasonable prospect the site will be developed during the plan period, taking account any viability issues	Identify any known viability issues at this stage such as information known by development management or through landowner engagement.

Criteria	Considerations	Assessment
	and the capacity of the landowner to bring forward and develop the site?	

2.6.3. At the end of this sifting exercise sites were discounted for the following reasons:

*Table 3 Reasons sites were discounted during sifting*

Criteria	Number of sites discounted
Site size	3
Open space	10
Other sources of pollution	3
Biodiversity	2
Heritage	3
Waste	6
Industrial	21
Infrastructure	90
Availability – under construction, have permission and will be delivered or have been delivered	18
Availability – landowner complexity	2
Availability – not enough certainty about availability to conclude site will come forward for development to be a site allocation	57

## 2.7. Stage 2b: Site Assessment

2.7.1. The sites shortlisted from the site sifting exercise underwent a detailed site assessment. The purpose of this exercise was to consider the site in more detail and to identify any constraints and opportunities that would need to be addressed through development and



design principles in any site allocation. The conclusions of the site assessment would also inform land use selection and capacity testing. Factors considered are set out in table 3.

*Table 4 Site Assessment Criteria*

<b>Site constraints and opportunities</b>	
<b>Category</b>	<b>Consideration</b>
Site boundary	Assessment of land ownership, existing delivery, site constraints and the character of the surrounding area to consider a suitable site boundary.
Land ownership	Assessment of known information from landowner including land uses aspirations, constraints (including legal) and phasing of site coming forward for development to inform availability and achievability as well as the potential boundary, uses, infrastructure requirements, design principles and phasing.
Planning history	Assessment of the planning history to inform the potential boundary, phasing, uses, infrastructure requirements and/or design principles.
Existing use	Assessment of existing use to inform uses, infrastructure requirements and/or design principles. Consideration of whether the existing uses need to be replaced and whether it has any specific requirements that have land use or design implications.
Designations	Assessment of existing and emerging Local Plan designations to inform potential uses, infrastructure requirements and/or design principles. This includes consideration of existing town centre, industrial, and community facility designations and informed by evidence base documents including Newham Retail and Leisure Study, Newham Employment Land Review and the Newham Community Facilities Needs Assessment.
Character of the site and surrounding area	Assessment of the character of the site and surrounding area, informed by the Characterisation Study, to inform potential design principles.
Open space, trees and biodiversity	Assessment of existing open space and trees on site and need identified via the Green and Water Infrastructure Study to inform potential uses and/or design principles.

Flood risk	Assessment of flood risk on and adjacent to the site to inform potential uses and design principles, particularly the location of uses across a site, informed by the updated Strategic Flood Risk Assessment and the location of flood defences.
Other environmental constraints	Assessment of land contamination, noise, smell and air quality on potential uses and design principles, particularly the location of uses across a site.
Heritage	Assessment of heritage designations on and adjacent site, informed by the Characterisation Study, to inform potential design principles.
Public transport, walking and cycling and highway	Assessment of PTAL and walking, cycling and highway routes to inform potential uses, infrastructure requirements and design principles with a focus on routes and access.
Neighbourhood vision	Assessment of the vision and categorisation of the site (conserve, enhance and transform) in the Characterisation study to inform potential design principles and to assess the site's role in achieving the neighbourhood vision.
Spatial strategy	Assessment of the site's role in achieving the spatial strategy and implications of this for uses, infrastructure requirements and design principles.
Future potential	
Tall buildings	Assessment of the suitability for tall buildings, informed by the Characterisation Study, to inform potential design principles on building heights.
Uses	Assessment of the potential uses that should be allocated on this site taking into account land use designations, emerging Local Plan policies, landowner aspirations and Local Plan evidence base. Further detail on land use selection is set out below.
Infrastructure requirements	Assessment of the potential infrastructure requirements that should be allocated on this site taking into account existing uses and known infrastructure requirements. Further detail on infrastructure requirements is set out below.

## 2.8. Landowner Engagement

- 2.8.1. Engagement with land owners took place throughout the site allocation identification and assessment process. This commenced with the Call for Sites exercise in October 2021. These submissions and any representations received by landowners as part of the Issues and Options consultation were considered as part of the site sifting and site assessment.
- 2.8.2. Searches were completed via Land Registry to understand any factors that may impact on a site's deliverability or availability. Letters were sent to landowners where the Council held no information about a landowner's aspirations for their site. Positive landowner engagement fed into the assessment of the suitability and availability of the site. The landowners of sites considered suitable for allocation were also contacted to provide any additional design work to that provided at Call for Sites or through recent pre-application or applications so that it could be considered as part of the capacity testing and site allocation drafting.
- 2.8.3. Landowners and developers were given the opportunity to comment on site allocations during the Regulation 18 consultation. These comments were considered alongside comments from statutory consultees, residents, local businesses and community organisations. Some comments resulted in changes to the site allocations. Further detail is set out in section 2.9 and Chapter 4 of this report.

## 2.9. Land use selection and infrastructure requirements

- 2.9.1. To select land uses for different sites the following considerations were made. This involved internal workshops and discussions with infrastructure providers such as the NHS.

### *Housing*

- 2.9.2. All sites shortlisted are considered suitable for housing.

### *Employment uses*

- 2.9.3. The identification of sites suitable for employment uses was informed by the Newham Employment Land Review, landowner aspirations and the assumption that existing uses on the site would be re-provided, as informed by the draft Local Plan policy and the ELR. This exercise identified where particular sectors and uses should be located in the borough and which sites were suitable for different uses to meet those requirements.

### *Main Town Centres uses*

- 2.9.4. The identification of sites suitable for main town centre uses was informed by the Newham Retail and Leisure Study, landowner aspirations and existing and emerging designations, particularly for new local centres and neighbourhood parades. This exercise identified where particular types of retail and uses should be located in the borough and which sites were suitable for different uses and scale of uses to meet those requirements. This included information from Public Health about food deserts in the borough.

#### *Community facilities*

- 2.9.5. The identification of sites suitable for community facilities was informed by the Newham Community Facilities Needs Assessment and existing uses.
- 2.9.6. Following Regulation 18, further work was done to identify sites that could meet the need for community facilities in neighbourhoods identified as having a shortfall of community facilities. An assumption was also made that sites within town centres would be suitable for community facilities, as informed by draft Local Plan policy.

#### *Education*

- 2.9.7. The identification of sites for education uses was informed by on-going engagement with the Council's Education Access and Infrastructure team about the need for different types of school places in the borough and the Newham School Place Planning Strategy 2022 to 2027. This exercise identified which sites were suitable to accommodate different types of schools, with the assumption that any primary school site would also deliver early years provision.
- 2.9.8. Engagement with the Best Start in Life team also identified parts of the borough that are deficient in childcare facilities as part of the Childcare Sufficiency Assessment 2021. This exercise identified sites providing community facilities that could accommodate this type of use.

#### *Health*

- 2.9.9. The identification of sites for health uses was informed by on-going engagement with the NHS and their need for different amounts of health centre floorspace in different parts of the borough. This exercise identified the sites suitable for accommodating this need identified through their Call for Sites and Regulation 18 submissions. Where there were options on which sites this could be accommodated on, factors such as phasing of sites was considered.

#### *Open space*

- 2.9.10. The identification of sites for open space was informed by the Green and Water Spaces Infrastructure Study. This identified that Newham has an under provision of open

space across the borough and there are particular wards where the need for open space is particularly acute. An assessment of how site allocations can contribute to meeting that need, particularly on sites with capacity to provide local parks, was identified in the Regulation 18 version of the Local Plan.

2.9.11. Between Regulation 18 and Regulation 19 the requirements for open space were further refined following the finalisation of the Green and Water Spaces Infrastructure Study to provide more detail about the type of open space to be provided on each site, as well as green infrastructure requirements to be included as design principles.

2.9.12. The Green and Water Spaces Infrastructure Study also contains play space and community food growing opportunities that have been reflected in the relevant infrastructure requirements.

#### *Built leisure and playing pitches*

2.9.13. The identification of sites suitable for new built leisure facilities in the Regulation 18 version of the draft Local Plan was informed by the Interim Built Leisure Needs Assessment which identified areas of the borough where facilities were needed. Where there were options on which sites this could be accommodated, factors such as phasing of sites and proximity to public transport and a town centre was considered. The site allocations were updated for Regulation 19 to reflect the finalisation of this evidence base as well as the requirements of the finalised Playing Pitch Strategy.

#### *Other infrastructure requirements*

2.9.14. Other infrastructure requirements such as bridges, public transport improvements and gasholder infrastructure were informed by the current Local Plan requirements and engagement with infrastructure providers and landowner requirements. The design principles and phasing and implementation section of relevant site allocations were updated to respond to comments from Thames Water and Network Grid on the impact of development on their assets and the need to engage with infrastructure providers.

2.9.15. The Sustainable Transport Strategy identified connectivity improvements or public transport infrastructure improvements necessary for development to come forward. These have been reflected in the relevant infrastructure requirements as well as feedback from TfL on design principles related to walking and cycling improvements.

### **2.10. Stage 3: Site Selection**

2.10.1. Following the site assessment process and the consideration of the suitability of sites for different uses a final decision was made on which sites should be allocated in the draft Local Plan. This included an assessment of whether:

1. The site is suitable, available and achievable.
2. The site contributes to the spatial strategy and/or is it necessary to deliver the neighbourhood vision.
3. The same outcomes could be achieved by other means.

2.10.2. To assess whether a site was suitable, available and achievable all of the information gathered about the site during site sifting, site assessment and landowner engagement was reviewed and a final conclusion made.

2.10.3. When considering whether a site contributes to the spatial strategy and/or whether it necessary to deliver the neighbourhood vision, the assessment assessed the role of the site in delivering the spatial strategy in terms of type and quantum of uses and infrastructure as well as factors such as whether it is the only developable site in the neighbourhood, whether it would help deliver the vision for the neighbourhood or help overcome a key challenge for the neighbourhood.

2.10.4. When considering whether the same outcomes could be achieved by other means (as set out in paragraph 23 of the NPPF), the assessment considered whether the development outcomes could be achieved without allocating the site, such as through the application of Local Plan policies, design guidance, small sites guidance, the implementation of existing planning permissions or including the site on the Brownfield Land Register.

2.10.5. The site allocation identification, assessment and selection concluded with the identification of 45 potential site allocations to be included in the Draft Submission Local Plan. Some of the sites submitted at Regulation 18 have been included in existing draft site allocations as additional development plots. Other sites were discounted for the following reasons:

Availability - no certainty about availability that site will come forward for development to be a site allocation	4
The same outcomes could be achieved by other means	41

2.10.6. One site allocation (Queen's Market) was removed from the draft Local Plan between Regulation 18 and Regulation 19. This is because of the on-going work being undertaken through the Queen's Market and Hamara Ghar Investment Strategy Study to establish what uses and what type of development may take place on this. However, this work has not been finalised and so the site has been removed from the Draft Submission Local Plan because we do not have the certainty at this stage on which option is being progressed by the council as the landowner to demonstrate the site is deliverable.

2.10.7. The sites considered suitable for taking forward as site allocations were then capacity tested to inform both the design principles in the site allocations and the housing trajectory. Other suitable, available and achievable sites which didn't meet the criteria to be site allocations, such as those where the outcomes could be achieved by other means, are considered as part of the housing trajectory and small sites work. This is set out in Chapters 3 and 4.

## 3. Site capacity testing

### 3.1. Introduction

- 3.1.1. Maccleanor Lavington were commissioned, as part of delivering the Newham Characterisation Study, to capacity test sites to be included as site allocations in the draft Local Plan (Regulation 18). This work provided design principles for site allocations, a housing capacity figure to inform the housing trajectory and the typologies in the Local Plan viability appraisal. For some sites a bespoke approach was taken: Stratford Waterfront South due to the uses (a higher education campus and student housing) being delivered on this site; and Carpenters Estate, which has just completed an extensive co-produced masterplanning processes and so did not undergo capacity testing but design principles were developed to reflect the estate masterplan. Prior to its removal from the Regulation 19 version of the Local Plan, the site allocation Queen's Market was informed the ongoing detailed options appraisal led by the Council's regeneration team (the Queen's Market and Hamara Ghar Investment Strategy Study).
- 3.1.2. This section sets out the methodology used for the capacity testing. Some site allocations were subject to further capacity testing between Regulation 18 and Regulation 19. This occurred when Regulation 18 consultation responses or the finalisation of evidence base resulted in changes to the uses on sites or to tall building zones. New sites (including new plots within existing draft site allocations) were also identified and were subject to capacity testing. This capacity testing was done internally and followed the same methodology as the work undertaken by Maccleanor Lavington.
- 3.1.3. The capacity testing and the figures arising from that work have not been published on a site by site basis. The exact scale of housing development which will come forward on each site allocation will depend on further detailed site design work undertaken through the application process. A range of housing capacities could be delivered while still meeting the design, housing, neighbourhood and site allocation policies and design requirements in the draft Local Plan. Section 4 of this note sets provides further detail about how the capacity figures were used in the housing trajectory.

### 3.2. Methodology

3.2.1. In February 2022, the GLA Good Quality Homes for all Londoners (Modules A to D) was superseded by the following draft London Plan Guidance (LPG):

- Characterisation and Growth Strategy
- Housing Design Standards
- Optimising site capacity: A design-led approach
- Small Site Design Codes

3.2.2. The methodology approach takes account of the draft London Plan Guidance to ensure the approach is consistent with the London Plan 2021 and takes account of the Optimising Site Capacity in particular. In addition, the methodology draws on and is consistent with the following relevant policy and guidance<sup>2</sup>:

a. **National Planning Policy Framework (NPPF)** (July 2021): including Sections 3 (Plan-making), (Delivering a sufficient supply of homes), (Building a strong, competitive economy), 7 (Ensuring the vitality of town centres), 8 (Promoting healthy and safe communities), 9 (Promoting sustainable transport) 11 (Making effective use of land), 12 (Achieving well-designed places), 14 (Meeting the challenges of climate change, flooding and coastal change), 15 (Conserving and enhancing the natural environment) and 16 (Conserving and enhancing the historic environment). The National Design Guide (2021) and National Model Design Code (2021) are also relevant.

b. **London Plan** (March 2021): including Policies GG2 (Making the best use of land), D1 (London's form, character and capacity for growth), D2 (Infrastructure requirements for sustainable densities), D3 (Optimising site capacity through the design-led approach), D4 (Delivering good design), D5 (Inclusive design), D6 (Housing quality and standards), D7 (Accessible housing), D9 (Tall buildings), D8 (Public realm), D13 (Agent of change), D14 (Noise) H1 (Increasing housing supply), H2 (Small sites), H4 (Delivering affordable housing), H6 (Affordable housing tenure), H19 (Housing size mix) E7 (Industrial intensification, co-location and substitution), HC1 (Heritage conservation and growth), G4 (Open space), G5 (Urban greening), G6 (Biodiversity and access to nature), G7 (Trees and woodlands, SI 1 (improving air quality), SI 12 (Flood risk management), SI 13 (Sustainable drainage), S4 (Play and informal recreation), T2 (Healthy streets), T3 (Transport capacity, connectivity and safeguarding), T5 (Cycling), T6 (Car parking), T6.1 (Residential parking), T6.3 (Office parking), T6.3 (Retail parking), T6.4 (Hotel and leisure uses parking), T6.5 (Non-residential disabled persons parking) and T8 (Aviation)

c. **London Plan Guidance (LPG)**, including the following:

- Draft Air Quality Neutral (November 2021);
- Draft Air Quality Positive (November 2021);

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<sup>2</sup> We acknowledge that updated policy and guidance has been published since this work was undertaken but it is considered the capacity testing methodology is consistent with these updated policies or guidance.



- Draft Urban Greening Factor (September 2021);
- Draft Large-scale Purpose-built Shared Living (January 2022);
- Draft Royal Docks and Beckton Riverside OAPF (February 2022);
- Draft Characterisation and Growth Strategy (Feb 2022);
- Draft Housing Design Standards (Feb 2022); and
- Draft Optimising site capacity: A design-led approach (Feb 2022).

**d. Newham Local Plan Refresh and evidence base**, including the following:

- LBN Characterisation Study 2022
- LBN Employment Land Review 2022
- LBN Retail and Leisure Assessment 2022
- LBN Strategic Housing Market Assessment and Gypsy and Traveller Accommodation Needs Assessment 2022
- LBN Carbon Reduction Evidence Base 2022
- LBN Community Facilities Needs Assessment 2022
- LBN Built Leisure Needs Assessment 2022
- LBN Green and Infrastructure Study 2022
- Emerging Draft Local Plan policies
- Responses to the Call for Sites exercise (November & December 2021);

**e. Newham SPDs and other guidance**, including:

- LBN Parks and Open Spaces Design Guide;
- LBN Sustainable Drainage Design & Evaluation Guide; and

LBN Conservation Area Appraisal and Management Plans and Design Guides (where relevant).

3.2.3. Using this guidance, a proportionate approach was taken to developing design work to inform the assessment of potential capacity of sites. It was based on available information, drawing on the Characterisation Study and, where necessary, additional site-specific information provided to Maccreevor Lavington by council officers, including any information submitted via landowner engagement. It is not based on topographical or utilities surveys (topography is considered to be flat and only significant utilities such as overhead pylons have been taken in to account) or detailed site or building design layouts. As outlined below, the indicative capacity testing follows the methodology that is set out in Stages 2-4 of the draft London Plan Guidance Optimising site capacity: A design-led approach unless stated.

### 3.3. Site analysis

3.3.1. The capacity testing draws on an analysis of site context and takes account of the following functional characteristics and urban morphology (as detailed in Chapters 3 and 4 of the Characterisation Study):

- a. Site Context
  - Site context (existing land uses/buildings/landscape on site and in surrounding area, access to public transport, location relative to town centres and 15-minute neighbourhood aspirations).
- b. Planning policy, guidance and history
  - Capacity testing takes account of the following:
    - Historic development patterns (from the Characterisation Study);
    - Existing London Plan and emerging Local Plan policy designations, including the Tall Building Zones (from the Characterisation Study and the Tall Buildings Annex);
    - Extant planning permissions for the site; and
    - Pre-application discussions on potential development opportunities.
- c. Environmental and infrastructure opportunities and constraints
  - Environmental and infrastructure opportunities and constraints (Sites of Importance for Nature Conservation, flood zones, tree canopy cover, air quality and noise); and
  - Connectivity, permeability and access to local services (street hierarchy, major routes, highways, aerial roads, high streets, The Greenway, pedestrian routes, social and community facilities and key barriers to walkability).
- d. Built form and open spaces
  - Built form and open spaces (neighbourhood character, emerging context and access to parks).
- e. Heritage and placemaking
  - Heritage assets, placemaking and landmarks.
- f. Building height, layout and uses
  - Building height, layout and uses (surrounding building heights and analysis of suitability for change in the Characterisation Study and land uses).
- g. Infrastructure capacity analysis
  - Infrastructure capacity analysis (opportunities to incorporate necessary social and green infrastructure).

### 3.4. Design vision

- 3.4.1. Indicative capacity testing draws on and is consistent with the evidence and findings of the Characterisation Study, including the Neighbourhood Vision and Principles and Borough-Design Principles.

### 3.5. Design parameters

3.5.1. Indicative capacity testing is based on the following general and Newham-specific design parameters and suite of topics presented in the draft Optimising Site Capacity LPG:

- a. Required minimum non-residential floorspace (sqm GEA) for land uses and social and environmental infrastructure to deliver policy objectives and facilitate growth;
- b. On-site social and green infrastructure located to take account of environmental constraints, including poor air quality, noise sources and overshadowing;
- c. New streets and routes to maximise connectivity with routes, services and destinations in the surrounding area, with street widths generally of 12-18m (building face to building face), in line with the Design Principles in the Characterisation Study and general street sections referred to in the National Model Design Code (to safeguard privacy, daylight and sunlight);
- d. All homes complying with the 'Private internal space standards', 'Private outside space standards' and accessible housing standards set out in London Plan Policies D6 & D7;
- e. The maximisation of dual aspect homes, with minimisations of north-facing single-aspect homes and taking account of BRE Site Layout and Planning for Daylight and Sunlight: A Guide to Good Practice (BR209:2022);
- f. On-site public realm, communal amenity space and play space meet the requirements of London Plan Policies D4, D8 and S4;
- g. All sites meet Draft Local Plan policy requirements for affordable housing requirements by unit rather than habitable rooms and;
- h. All housing tenures fully integrated within the site, with shared communal and play space being shared by occupiers of all buildings that these spaces serve;
- i. On-site cycle parking in line with minimum standards in London Plan Policy T5;
- j. On-site residential car parking & non-residential car parking restricted to operational requirements and disabled persons parking only (10%) (as set out in London Plan Policies T6 and T6.1 to T6.5);
- k. All homes in Flood Risk Zones 2 and 3 are to have habitable rooms at first floor and above only (with residential lobbies and ancillary spaces only at ground floor level);
- l. No basement levels (on the basis that these are expensive/adversely affect viability, necessitate a significant amount of energy/carbon in their creation and, when providing car parking, discourage active travel);
- m. All roof space being optimised around the provision of mechanical plant, living roofs and PV arrays (no residential amenity or play space included);

### 3.6. Residential Building Types

3.6.1. The indicative capacity testing takes account of the model typologies that are included in the draft Optimising Site Capacity LPG (Appendix 1 - Indicative Site Capacity Toolkit – Residential types) but is the product of site-specific volumetric modelling undertaken by Maccleanor Lavington using BIM software.

3.6.2. The massing and layout of the residential types used for the site-specific modelling is slightly different from that in the Toolkit versions, to reflect the Newham-specific design

parameters set out above and to take account of the bespoke indicative layouts for each site. However, block depths and proportions are based on the typologies as set out in the Toolkit in order to ensure consistency with the draft LPG's methodology and its Indicative Site Capacity Calculator. A further refinement of the Toolkit is that proposed non-residential floorspace has been specifically drawn and measured, rather than merely discounted through the Indicative Site Capacity Calculator.

### 3.7. Assumed dwelling mix & tenure

- 3.7.1. Taking account of the Newham Strategic Housing Market Assessment and Gypsy and Traveller Accommodation Needs Assessment 2022 and to inform viability testing scenarios the following dwelling mix scenarios were tested at Regulation 18 to establish the impact on site capacities:

%	All tenures (scenario 1)	All tenures (scenario 2)	All tenures (scenario 3)
1 bed	15%	15%	15%
2 bed	25%	35%	45%
3 bed	55%	45%	35%
4 bed	5%	5%	5%

- 3.7.2. Following changes to the housing mix between Regulation 18 and Regulation 19 the final site capacities reflect the following housing mix:

%	All tenures
Studio	5%
1 bed	10%
2 bed	45%
3 bed	35%
4 bed	5%

- 3.7.3. The above dwelling mix has been incorporated in to the Indicative Site Capacity Calculator spreadsheet (Figure 5.2 in draft Optimising site capacity LPG). The dwelling mix is by unit, rather than habitable room, as per the GLA Indicative Site Capacity Calculator.
- 3.7.4. As set out in paragraphs 3.1.1 and 3.1.2 this work concluded with a capacity figure which has informed the Local Plan viability appraisal and the development of the housing trajectory. It also produced a set of design principles and a 2D site map showing key

design principles which have been used to inform the draft site allocations in Section 4 of the Draft Submission Local Plan. The site allocation maps were simplified during Regulation 18 and Regulation 19 in response to feedback received during the Regulation 18 consultation and to ensure a consistent approach to how the design principles are illustrated.

## 4. Housing Trajectory Methodology

### 4.1. Introduction

- 4.1.1. This section sets out the types of sites that are included within the borough's housing trajectory. It also sets out the approach to establishing the capacity of those sites assumed in the trajectory and to phasing housing capacity within the Submission Local Plan's housing trajectory.
- 4.1.2. Currently, the borough's housing target is set out within London Plan (2021) Policy H1. Newham and the part of the borough administered by the LLDC have a combined housing target to deliver 47,600 new homes between 2019/20 and 2028/29. The portion of the borough's housing target on land previously administered by the LLDC has been confirmed by the GLA, and is based on the methodology from the GLA's 2017 Strategic Housing Land Availability Assessment.
- 4.1.3. The Submission Local Plan includes a new range housing target for the borough of between 51,425 and 53,784 new housing units being delivered between 2023 and 2038 (for further information on the range target see section 4.4).
- 4.1.4. Subsequently, a modification has been proposed to the Submission Local Plan, for the Inspector's consideration, with an updated range housing target for the borough of between 53,194 and 54,976 (from here on referred as "the proposed Local Plan housing target"). This update is provided with reference to the Planning Inspectorate's [Guidance Procedure Guide for Local Plan Examinations](#), which sets out at paragraph 1.6 that LPAs may submit to the examination a list of proposed changes to the published plan that have not been the subject of consultation, which the Inspector may consider appropriate to be discussed at the hearing sessions. In this instance, the modification seeks to ensure the examiner can consider Newham's latest trajectory position. This new target reflects Newham's Starts and Completions exercise for year 2023/24 and any associated updated phasing based on the methodology set out in section 4.5 of this trajectory methodology note. If adopted, this target would supersede the borough's current London Plan (2021) housing target.
- 4.1.5. Tables 10 to 13 set out both the proposed Local Plan housing trajectory for the new plan period, and summarise the five year housing land supply. Tables 10 and 12 measure the 5 year land supply and housing trajectory against the adopted London Plan housing target, while tables 11 and 13 measure the 5 year land supply and housing trajectory against the proposed Local Plan housing target.

## 4.2. Sites that are included in the Housing Trajectory

4.2.1. The National Planning Policy Framework (NPPF, 2023) at paragraph 68 sets out the following in relation to identifying land for homes:

“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”

4.2.2. The NPPF also provides the following definitions of ‘deliverable’ and ‘developable’:

**“Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

**Developable:** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”

4.2.3. The former Secretary of State indicated that the above glossary definition of ‘deliverable’ does not form a ‘closed list’, and that the examples given in the NPPF glossary are not an exhaustive list of all types of sites that are capable of being considered ‘deliverable’.<sup>3</sup>

4.2.4. Table 5 below sets out the types of sites that have been included within the Draft Submission Local Plan’s housing trajectory, whether they are considered deliverable or developable and explains how their capacity figure has been decided. Details of how these sites have been phased is set out later in this methodology note in the section 4.5.

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<sup>3</sup> Planning Resource, [‘Secretary of state accepts that ‘deliverable’ housing site definition is wider than NPPF’s “closed list”’](#) (June 2020)

- 4.2.5. In some instances, capacity figures may be derived from two sources, for example a site that has a planning permission for housing that has also been subject to design-led capacity testing by Maccreanor Lavington or internally. In these instances, whichever is the higher figure has informed the higher housing target set out in the draft Submission Local Plan Policy H1, while the lower figure has informed the lower range housing target. More information on the 'range target' is set out in section 4.4 below.

*Table 5: Sites types included in Newham's Submission Local Plan Housing trajectory*

Site type	How capacity is derived	Are sites considered 'deliverable' or 'developable'?
Sites with planning permission	Capacity reflects application housing delivery numbers.	Deliverable
Sites with resolution to grant	Capacity reflects application housing delivery numbers.	Deliverable
Site allocations without a planning permission or resolution to grant.	Capacity reflects design-led capacity work undertaken by Maccreanor Lavington or internally (see section 3 above).	Developable
Lapsed permissions	Capacity reflects lapsed application housing delivery numbers.	Developable.
Small sites (under 0.25ha) (windfall)	Capacity reflects the 10 year targets (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size) in Policy H2 of the London Plan.  Small sites have been amalgamated under a single 'small sites' entry within the trajectory. The only exceptions to this are small sites which are also site allocations or specialist housing, which in most cases require the application of a ratio showing how many general needs homes the accommodation would free up. In both these cases, these sites will be recorded under their own individual trajectory entries.	Deliverable.
The London Strategic Housing Land Availability Assessment 2017 Sites (windfall)	Capacity reflects housing numbers determined through the 2017 London Strategic Housing Land Availability Assessment, which were assessed as being suitable for residential development and underpin Newham's current London Plan housing target.	Developable.



	<p>Any capacity from 2017 SHLAA sites that:</p> <ul style="list-style-type: none"> <li>• have planning permission;</li> <li>• have a resolution to grant; or</li> <li>• are on site allocations without a planning permission or resolution to grant;</li> </ul> <p>have been disaggregated from the SHLAA totals and are phased separately according to their relevant site type listed above.</p> <p>Any capacity on 2017 SHLAA sites considered no longer suitable for housing through the site allocations assessment process have been removed (for example, to reflect the draft Submission Local Plan's new policy position that resists co-location on Local Industrial Locations).</p>	
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### 4.3. Small sites

#### 4.3.1. Policy H2.A of the London Plan states that:

"Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to... 5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1."

#### 4.3.2. Table 4.2 of the 2021 London Plan sets Newham a 10 year target to deliver 3,800 net housing completions on small sites (below 0.25 hectares in size) between 2019/20 - 2028/29. In the supporting text, at paragraph 4.2.3, the London Plan states that:

"The small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 70 of the National Planning Policy Framework of 2019."

#### 4.3.3. In the housing trajectory that informs Newham's housing target, we have used the annual small sites target (380 units per year) as a windfall assumption on sites below 0.25ha as per the above supporting text.

#### 4.3.4. In recent years, Newham has experienced, on average, lower completion rates than the London Plan small sites annualised target of 380 units per year.

*Table 6: Delivery on small sites (<0.25ha) in Newham since 2018/19*

	18/19	19/20	20/21	21/22	22/23	23/24	Average
Small sites (<0.25ha)	344	335	255	333	213	589	345

- 4.3.5. In order to further understand future delivery on small sites, as part of the Characterisation Study the Council has prepared a small sites intensification design guide that will be used to determine site capacity on small sites. This document classifies typical small sites found across Newham into a series of site types. Each site type is accompanied by a description; a series of design considerations; an annotated design parameters drawing; and a best practice example from Newham and other London boroughs.
- 4.3.6. We consider that an improvement in small sites completions should be reflected in future years, facilitated by the policy within the Submission Local Plan and this recently produced guidance as part of the Characterisation Study on delivering design-led capacity optimisation on small sites. An increase in small sites delivery is also likely to be facilitated through the London Plan policy H2 (small sites) policy, which has been adopted for a number of years and is translating to increases in small site completions that have been assessed against this new policy context. Indeed, this is reflected in completions for financial year 23/24, which showed a marked increase of 589 small site units completed in the financial year.
- 4.3.7. We anticipate this positive trend will continue in future years on this basis.

#### 4.4. Range trajectory

- 4.4.1. The proposed Local Plan housing target is set out as a range figure. This is because some sites within the trajectory have high and low capacity assumptions. In most cases this is due to a site being subject to design led-capacity testing where the site also already has an extant planning permission that is yet to start construction. In these instances, whichever is the higher figure of the two capacity figures (a permission or design-led testing) has informed the higher range housing target figure (54,976 homes), while the lower figure has informed the lower range housing target (53,194 homes). Some lower capacity figures also reflect smaller boundary options or reduced housing capacity assumptions if key pieces of infrastructure that unlock higher density housing development are not delivered, for examples upgrades to Stratford Station.
- 4.4.2. Between Regulation 18 and the Submission Local Plan, the difference between our higher and lower capacity targets has reduced. This has been due to very recent permissions superseding design-led capacity testing, or certain lower capacity scenarios no longer being considered (for example, due to the Mayor of London's decision on the MSG Sphere).

- 4.4.3. Delivery against our housing target each year will be monitored using the lower figure of the range Submission Target (53,194 homes by 2038).

## 4.5. Methodology for site phasing

- 4.5.1. Housing delivery over the new plan period is split into short, medium and long term phases as follows. These housing delivery figures have been updated from the Regulation 19 Local Plan (Draft Submission), and are proposed as a modification to the Submission Local Plan for the Inspector's consideration, reflecting the proposed Local Plan housing target:

*Table 7: The proposed Local Plan stepped housing trajectory housing requirement figures set out in the modification for policy H1 of the Submission Local Plan for the Inspector's consideration*

	Short term	Medium term	Long term
Years covered	2023/24 – 2027/28	2028/29 – 2032/33	2033/34 – 2037/38
Annual target	2,957	3,966	3,716

- 4.5.2. Each phase of the plan has a different housing target. This is referred to as a 'stepped trajectory', and it helps ensure our targets in each year of the plan reflect our expectations around when sites will deliver housing units.
- 4.5.3. Noting the NPPF definitions of 'deliverable' and 'developable' above, the Council has adopted a standardised approach to site phasing within the trajectory. The approach to phasing different types of sites is set out below in Table 8. This approach has also informed the 'Phasing and implementation' section of the site allocations in the Neighbourhoods section of the Submission Local Plan.

*Table 8: Housing Trajectory Phasing Methodology*

Consent type	Phasing
<i>Sites with planning permission or resolutions to grant planning permission</i>	
Started schemes	<ul style="list-style-type: none"> <li>≤ 50 units/bed spaces: expect to complete within 1 year</li> <li>&gt; 50 units/bed spaces: expect to complete within 2 years from commencement year</li> </ul>
Not started schemes	<ul style="list-style-type: none"> <li>≤ 50 units/bed spaces: expect to complete within 2 years</li> <li>&gt; 50 units/bed spaces: expect to complete within 3 years</li> </ul>
Prior approvals	<ul style="list-style-type: none"> <li>Expect to complete within 3 years from date of consent</li> </ul>
Hybrid permissions	<ul style="list-style-type: none"> <li>Expect to complete within 3.5 years</li> <li>If all detailed phases benefit from consent (or resolution to grant), phase as per 'Not started schemes'</li> </ul>
Outline permissions	<ul style="list-style-type: none"> <li>Expect to complete within 4 years</li> </ul>
Resolution to grant	<ul style="list-style-type: none"> <li>+ 0.5 years on top of above phasing expectations, added from the date the resolution to grant is obtained</li> </ul>

In instances where a developer, applicant, agent or landowner supplies credible information to the Borough around phasing expectations for schemes which benefit from planning permission, this information will take precedent over the above outlined phasing assumptions.

In most instances where a developer has not supplied more detailed phasing information, a delivery rate of around 150 units / bed spaces delivering per year has been assumed. This figure has been arrived at through an examination of Newham's historic delivery levels, which have demonstrated that on average larger-scale, major schemes deliver at a rate of least 150 units per year. A higher delivery rate of 200 units per year had been assumed for the largest schemes in the trajectory (generally over 1000 units). This reflects delivery rates for similar-sized schemes in the borough in recent years, with schemes like Royal Wharf delivering over a thousand units per year for two consecutive years. Therefore, we consider our assumed delivery rate is relatively conservative in the context of recent delivery trends. In a small number of instances, where developments are phased in a small number of blocks or towers, phasing is as per the number of units in individual blocks or towers, noting there is a likelihood that these units will be delivered in the same year when the individual block or tower is completed.

There are some schemes included within the 5 years land supply which gained consent following the close of last year's starts and completions exercise. In these instances, timescales are based either on the date of consent or when a resolution to grant was obtained. This helps to ensure that phasing expectations are applied consistently for those schemes which have been granted consent within recent months.

#### *Site allocations without a planning permission or resolution to grant*

- Sites that have received landowner engagement suggesting they will be delivered in the next 5-10 years have been phased starting from the medium term of the plan period. The anticipated start date for a scheme falls outside of the 5 year land supply where sites do not benefit from planning permission or a resolution to grant.
- Sites either:
  - dependent on large scale infrastructure delivery;
  - where landowners have indicated delivery will take place in the long term phase of the plan period; or
  - where landowners have not provided a response around delivery timescales
 have been phased from the long term phase of the plan period.

There are a small number of sites without positive landowner engagement that have been phased in the medium term, namely where there are a small number of units being delivered on the site and there are no complex infrastructure delivery requirements.

A delivery rate of between 150 and 200 units per year has been assumed, dependent on the scale of the scheme.

#### *Lapsed permissions*

- Sites that have received landowner engagement suggesting they will be delivered in the next 5-10 years have been phased starting from the medium term phase of the plan period. The anticipated start date for a scheme falls outside of the 5 year land supply where sites do not benefit from planning permission or a resolution to grant.
- Other lapsed permission sites have been phased starting from the long term phase of the plan period.

#### *The London Strategic Housing Land Availability Assessment (SHLAA) 2017 Sites*

- Capacity from 2017 SHLAA sites have been phased starting from the long term phase of the plan period. The length of time a site will take to deliver and the distribution of capacity between phases reflects the 2017 SHLAA phasing.
- The only exception to this is where landowners have provided positive landowner engagement through our engagement on site allocations. These sites have been phased to start from the medium term of the plan period. The anticipated start date for a scheme falls outside of the 5 year land supply where sites do not benefit from planning permission or a resolution to grant.
- A delivery rate of between 150 and 200 units per year has been assumed, dependent on the scale of the scheme.

#### *Sites in the London Legacy Development Corporation (LLDC) area*

- These sites have been phased according to latest information from the LLDC, as they undertook an extensive landowner engagement exercise in 2022.
- There are some exceptions to this where sites have been subject to design-led capacity testing, due to evidence that a landowner may be revising the design of the site. For example, a site may be phased in the longer term where there is a known need to resubmit a planning application.
- Where sites have received a recent planning permission, the methodology phasing assumptions for 'sites with planning permission or resolutions to grant planning permission' may supersede the LLDC's phasing assumptions.
- The anticipated start date for a scheme falls outside of the 5 year land supply where sites do not benefit from planning permission or a resolution to grant.

#### *Small sites*

A small sites assumption of 380 units per year of the housing trajectory has been assumed.

## 4.6. 5 year land supply (London Plan Housing Target)

- 4.6.1. Tables 10 to 13 provide a summary of the Council's proposed Local Plan housing trajectory and 5 Year Land Supply position respectively as at July 2025. Tables 10 and 12 have been calculated using the borough's adopted housing target set out in the London Plan (2021), while tables 11 and 13 have been calculated using the lower range of the proposed Local Plan housing target.
- 4.6.2. Results of the Housing Delivery Test are published annually by the MHCLG, with the results of the 2023 measurement published in December 2024. The detailed results of the 2023 measurement for Newham is provided below.

#### *London Borough of Newham 2023 HDT Measurement<sup>4</sup>*

Number of homes required			Total	Number of homes delivered			Total	Measurement	Consequence
2020-21	2021-22	2022-23		2020-21	2020-21	2021-22			
1,832	2,752	2,752	7,336	1,577	2,360	526	4,463	61%	Presumption

- 4.6.3. During this monitoring period the London Legacy Development Corporation (LLDC) was a separate plan-making authority. However, the majority of the area within the LLDC boundary is part of the London Borough of Newham. As such, the HDT result for the LLDC is also provided below. It should be noted that the LLDC's planning powers were transferred back to Newham on 1st December 2024.<sup>5</sup>

#### *London Legacy Development Corporation 2023 HDT Measurement*

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

- 4.6.4. The NPPF at paragraph 69 sets out:

“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for five years following the intended date of adoption<sup>35</sup>; and
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

<sup>35</sup> With an appropriate buffer, as set out in paragraph 77. See Glossary for definitions of deliverable and developable.”

- 4.6.5. Paragraph 77 sets out that (emphasis added):

“In all other circumstances, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years’ worth of housing, or a minimum of four years’ worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against **either the housing requirement set out in adopted strategic policies**, or against the local

<sup>4</sup> MHCLG: [Housing Delivery Test: 2023 measurement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement)

<sup>5</sup> LLDC: [Transfer of Planning Powers | Queen Elizabeth Olympic Park](https://www.lldc.org.uk/transfer-of-planning-powers)

housing need where the strategic policies are more than five years old. Where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period). National planning guidance provides further information on calculating the housing land supply, including the circumstances in which past shortfalls or over-supply can be addressed.”

- 4.6.6. As the adopted strategic policies in the London Plan are less than 5 years old, supply has been tested against this target. In addition, due to the 2023 Housing Delivery Test result, a buffer of 20% has been applied to Newham’s London Plan 5 year land supply target (a buffer of 3,280 homes per year). No buffer has been added to the LLDC’s portion of the London Plan target, as per the requirements of the 2023 NPPF.
- 4.6.7. Identified 5 year land supply sites primarily comprise consented schemes and applications with a resolution to grant from a development committee (89% of sites within the 5 year land supply). Sites with planning permission or a resolution to grant are listed individually within the 5 year supply. The remaining 11% is projected capacity from small sites (below 0.25ha).

## 4.7. Shortfall against London Plan 2021 target

- 4.7.1. Table 12 shows that Newham is unable to demonstrate a 5 year housing land supply when measured against the adopted London Plan housing target. This position is worsened when the buffer is applied to the borough’s London Plan housing target. Table 12 also shows delivery shortfall from previous years added to the 5 year supply target (the Sedgefield approach).
- 4.7.2. Taking the shortfall and buffer into consideration Newham only has a land supply of 2.22 years. Table 10 also demonstrates that Newham 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 16,278 units. This shortfall against the London Plan target reflects the significant amount of Newham’s housing target that is now anticipated to be delivered from 2028/29 onwards. However, it is important to note that our inability to meet our London Plan housing target is not because the borough lacks available sites to deliver homes. Instead, the shortfall of delivery against our London Plan target stems from delays to the delivery of allocated sites within our adopted Local Plan, discussed in further detail below (see paragraph 4.8.4).
- 4.7.3. In order to address the considerable shortfall against our London Plan target we anticipate delivery of the shortfall over the course of our emerging Local Plan period (the Liverpool method). This is discussed in further detail in Section 4.9 below.

## 4.8. Managing the shortfall

- 4.8.1. The PPG (Paragraph: 022 Reference ID: 68-031-20190722) states the following in regards to addressing shortfalls (emphasis added):

*The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. **If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.***

*Where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make. For example, by considering developers' past performance on delivery; reducing the length of time a permission is valid; re-prioritising reserve sites which are 'ready to go'; delivering development directly or through arms' length organisations; or sub-dividing major sites where appropriate, and where it can be demonstrated that this would not be detrimental to the quality or deliverability of a scheme.*

- 4.8.2. Newham's housing delivery has consistently fallen below the annualised housing requirement figure in the 2021 London Plan. On this basis, we consider that it is more appropriate, as per the above PPG guidance, for Newham's anticipated future shortfall to be dealt with across the longer term via Newham's proposed Local Plan housing target.
- 4.8.3. Recognising our considerable shortfall in meeting the London Plan housing target, our new housing target reflects the trajectory phasing approach set out in table 8. This includes an assumed delivery rate for sites of between 150 and 200 units per annum. This has resulted in a much more realistic phasing assumption on the largest site allocations within the Local Plan when compared with phasing in the 2017 SHLAA, which informed the 2021 London Plan targets. This more conservative approach to delivery on the plan's largest site allocations reflects the significant impacts that delays to the delivery of site allocations have had to the overall delivery of Newham's housing target, reflected in housing completion figures since 2019/20. It is anticipated this more realistic approach to site phasing will help to 'absorb' any unforeseen delays to individual permissions; for example, one scheme delivering over 150 units in a year may help to compensate for a delayed scheme which delivers units later in the plan period than originally anticipated.
- 4.8.4. In order to understand delays to our housing delivery in more detail, following the Regulation 18 consultation Newham have worked with the GLA to compare our projected housing capacity to the 2017 Strategic Housing Land Availability Assessment assumptions. This analysis has shown:



- The largest site allocations within the Submission Local Plan show a number of differences when comparing capacity with the 2017 SHLAA, both in terms of phasing and projected capacity.
- Comparing the overall capacity of site allocations in the new Local Plan with the 2017 SHLAA, capacity assumptions have improved significantly. The key reason for the higher capacity figures is the design-led capacity testing work, which has optimised housing delivery on a number of sites. Seven site allocations' capacity assumptions have increased by over 1000 units.
- Those sites resulting in significant loss of capacity (more than 500 units fewer) tend to reflect:
  - Regeneration sites where there has been a shift in the approach to masterplanning (for example to undertake the GLA's resident ballot policy requirements, to incorporate more retrofit, to deliver additional infrastructure to meet identified needs or to prioritise smaller-scale infill and re-development as part of co-designed masterplanning with communities); and
  - Larger sites with a range of plots in different ownerships, that have been subject to more detailed design-led capacity work of available plots rather than the 2017 SHLAA formula based on the total site area.
  - Sites where the LLDC has sought to vary the requirements of the Legacy Communities Scheme consent, which informed the 2017 SHLAA capacity.
- There have been significant delays to anticipated completion date for site allocations. Delays to completions expectations including and beyond 5 years are for reasons including:
  - market conditions affecting the viability of scheme delivery (for more information see the discussion of the London Housing Delivery Taskforce findings below at paragraph 4.8.8);
  - regeneration schemes undertaking more extensive co-design with residents and being subject to resident ballots;
  - resource gaps in the public sector delaying the delivery of sites that are publicly owned;
  - large-scale site allocations requiring the delivery of supporting infrastructure delivery to facilitate high density residential development; and
  - the Council assuming more realistic phasing of sites with complex land ownerships, which will require masterplanning discussions with a range of landowners.
- Some site allocations are also anticipated to take more years to complete than assumed in the SHLAA. This has particularly affected the largest site allocations in the plan. This is because we have adopted a more realistic delivery rate, which ranges between 150 and 200 units per year. Information supplied by the GLA which was used to inform the Beckton and Royal Docks OAPF and/or support the Housing and Land GLA function suggested these sites should be delivered in a shorter time period. However, in the time which has lapsed between the assessment being made and the Regulation 19 (Draft

Submission Local Plan being published, key milestones in the information provided have already been missed, suggesting our assumed delivery rates are indeed more realistic. Our newly assumed delivery rate of between 150 and 200 units per annum per site more closely reflects historic delivery trends in our housing trajectory, reflective of the guidance in the PPG (Paragraph: 022 Reference ID: 68-031-20190722) to consider “developers’ past performance on delivery”. Although we recognise a large scale strategic site may deliver much higher unit numbers over a shorter period of time, this over delivery is likely to be balanced out by delays to the delivery of other large scale strategic sites. A more conservative delivery rate spread over a single or multiple phases of the draft plan therefore provides a more realistic phasing assumption, which addresses the issues discussed below and as directed by the PPG (Paragraph: 022 Reference ID: 68-031-20190722).

- 4.8.5. Following the Regulation 19 consultation stage, the Council has engaged further with the GLA regarding our housing target. This has included working on a Statement of Common Ground and associated duty to cooperate appendix. As per their Regulation 19 consultation response, the Mayor of London has objected to the proposed housing target set out in the Submission Local Plan and has raised a general conformity objection to the plan on this basis. Instead, the Mayor of London considers that Newham should work towards delivering 47,600 homes between 2019-20 and 2028-29 as per Newham’s 2021 London Plan housing target. The Mayor considers the current significant shortfall should be made up within the London Plan period, or where this is not possible, as soon as possible after that time. The Mayor of London has also expressed concerns regarding the expected phasing and speed of delivery of the residential capacity in Newham, and proposed delivery rates following the close of the London Plan period. They requested the Council to indicate how all reasonable steps have been taken to help speed up delivery of housing sites; these steps are set out fully within the Statement of Common Ground and associated duty to cooperate appendix with the GLA, which reflect the actions suggested under PPG paragraph 022 Reference ID: 68-031-20190722. In view of the changes in the national policy context, namely the publication of the Local Housing Need figure for London being 87,992 homes per annum, the GLA have clarified that any previous advice prior to the publication of London’s new housing need figure is be considered out-of-date, recognising the importance of maximising housing delivery to meet London’s housing need figure in future years.
- 4.8.6. Notwithstanding the GLA’s concerns, the Council considers that our approach to site phasing provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. We have worked and will continue to work positively and proactively with all stakeholders to help unlock the delivery of sites as discussed in paragraph 4.9.1 below. Newham will continue to engage with the GLA on delivery against their current housing trajectory and any shortfall that will need to be made up in a later period.

4.8.7. Newham have also worked extensively with the GLA in the preparation of the forthcoming London-wide SHLAA, which will support the update to the London Plan and delivery against the cumulative housing need for London. However, there are likely to be differences in assumptions between the site assessment approach under the 2017 SHLAA and the new SHLAA, as well as between the new GLA SHLAA and the assumptions which inform the proposed Local Plan housing trajectory. To ensure clarity for the Examiner and interested parties, if the 2024/25 SHLAA and a new draft set of borough housing targets is published during Newham's Local Plan examination, the Council will seek to work with the Mayor of London to explain the different methodologies used and how this results in any differences between the 2021 London Plan housing target for Newham (informed by the 2017 SHLAA), Newham's proposed Local Plan housing target and the new draft set of borough targets.

4.8.8. As noted above, in recent years market conditions have had a significant impact on housing delivery in Newham. In October 2023, the London Housing Delivery Taskforce published a Joint Position Statement<sup>6</sup>, outlining a number of recommendations for interventions needed to safeguard delivery of homes in London, with a particular emphasis on affordable housing. The London Housing Delivery Taskforce, convened by the GLA and London Councils, consisted of leaders from across London's housebuilding sector. Along with identifying interventions needed to safeguard delivery of homes in London, the position statement also outlined the current challenges impacting housing delivery in London. The report provides a helpful summary of the challenges that have affected housing delivery in Newham in recent years. These challenges are summarised below:

- **Macro-economic conditions** – Primarily housebuilding is being affected by very high inflation and interest rates, which have risen sharply in recent years. While construction material costs have stabilised, these remain very high. High inflation and interest rates have raised the costs of development, including debt servicing, reducing the demand for sales. This has led to increased contractor insolvencies, adding further uncertainty into the sector.
- **Lack of government investment** – Lack of grant funding for affordable housing has slowed delivery, particularly by Councils and housing associations. This lack of investment has reduced counter-cyclical investment, which in turn has slowed delivery. Under-investment in existing properties also has diverted provider's interests towards maintenance and repairs, rather than developing new stock. Providers of affordable housing have also been affected by below inflation rent rises in 2022 and the 2016-2020 rent reduction. The report suggests a lack of government investment in the sector, including a lack of long-term infrastructure funding and revenue funding, is negatively affecting the delivery of homes across the capital.

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<sup>6</sup> GLA, London Housing Delivery Taskforce, <https://www.london.gov.uk/sites/default/files/2023-11/LHDT%20-%20Joint%20position%20statement%20-%20November%202023.pdf> (2023)

- **Policy uncertainty** – The statement cites a lack of clarity from the former government on the implementation of the newly introduced second staircase requirement, the future rent settlement and proposals for a new Infrastructure Levy.
- **Funding rigidity** – Central government rules on the funding of housing delivery are considered too stringent, for example the Affordable Homes Programme funding settlement, which often lacks sufficient flexibility to adapt to changing market conditions and lacks certainty around its funding beyond 2026. Similarly, rules on Right to Buy receipts can make it difficult for authorities to deliver replacement homes.
- **Planning** – The former Government’s cuts have led to issues with the retention of planning officers, which can result in delays to the application process.
- **Long standing challenges** – These include the high cost of land in the capital, which particularly affects the delivery rates of small house builders, results in limited demand for market sale homes given high prices, and high rates of homelessness and temporary accommodation use, which particularly affect Newham residents and the Council’s budget.
- **Emerging second staircase requirement** – In Newham, this has resulted in the redesign of a significant number of applications on strategic sites, including Twelvvetrees Park and Former Bromley By Bow Gasworks, Connaught Riverside and Sillvertown Quays, as well as further sites subject to pre-application discussions, causing delays to delivery.

4.8.9. Alongside the above, we have also heard from developers that there have been delays to schemes as a result of delayed responses during the building safety regulator’s Gateway 2 process.

4.8.10. The aforementioned factors have affected housebuilding rates across London, and particularly in Newham where housing delivery is largely brought forward on large site allocations delivered by major housing developers and, to a lesser extent, small and medium sized developers, who help to deliver the borough’s small sites.

4.8.11. Our updated anticipated delivery timescales are reflected in the proposed Local Plan stepped housing trajectory. This sets different annual housing delivery targets for the short, medium and long term phases of the plan period, reflecting our anticipated delivery timescales for deliverable and developable sites. Table 11 shows that Newham has sufficient housing capacity to meet the borough’s Submission Local Plan capacity-based housing target over the course of the proposed plan period to 2037/38, with a surplus of 1,781 units. Table 13 also shows that Newham has 5.23 years of housing supply measured against the housing target proposed through the Submission Local Plan.

## 4.9. Optimising housing delivery

- 4.9.1. As a pro-development authority Newham is seeking all options to optimise the delivery of homes that meet our residents' needs. As outlined in [Newham's Housing Delivery Test Action Plan \(2025\)](#), in recent years Newham has undertaken actions to support housing delivery occurring faster, helping to address delivery constraints. This includes the progress made to date on the refresh of Newham's Local Plan and the endorsement of the Royal Docks and Beckton Riverside Opportunity Area Planning Framework. Newham has also undertaken proactive steps at administration level to boost housing delivery, through the Affordable Homes for Newham programme and Populo Living (Newham's wholly-owned housing company), which is identified through the PPG as one of the potential options boroughs can consider for addressing historical shortfalls ("delivering development directly or through arms' length organisations"). Alongside this, we continue to maintain constructive working relationships with stakeholders to achieve a co-ordinated approach to delivery. These stakeholders include land owners, land promoters, residents and Duty to Co-operate Partners. As a planning service we offer dedicated planning officers, as part of the Planning Performance Agreement offer, on strategic sites. We have also funded a dedicated transition project officer and two planning officers to support the transition of planning powers from the London Legacy Development Corporation (LLDC), ensuring timely support for the delivery of LLDC sites, and ensuring sufficient resource is available to manage the large remaining workload of new sites and applications transferring from the LLDC.
- 4.9.2. With regards to site allocation delivery, we have and will continue engagement with the GLA, TfL and Homes England to facilitate the delivery of Beckton Riverside, the borough's largest site allocation. This includes addressing the complex infrastructure requirements for the site, helping to ensure the coordination required to optimise and deliver the site as quickly as possible. We are also working with the LLDC, Network Rail and Transport for London (TfL) to develop the Strategic Outline Business Case (SOBC) for the long-term redevelopment of Stratford station and the surrounding area to address capacity and connectivity issues. Early agreement on funding improvements will help unlock and accelerate development in the wider Stratford area.
- 4.9.3. Despite disappointing levels of completions in recent years, Newham has a very high number of schemes under construction in our pipeline, with 14,025 units having started as of 31/03/2024. This figure, plus completions to date during the London Plan period equates to around 61% of our London Plan housing target having either completed or being under construction. Newham are confident that our updated phasing means our proposed housing target is realistic and deliverable within the draft Submission Local Plan period.
- 4.9.4. We have also identified a significant level of housing capacity in the borough through the review of the Local Plan, which exceeds our London Plan housing target, albeit in a longer timeframe. Our housing delivery projections suggest we will meet our London Plan housing target by 2033/34 (as shown in table 9 below). In the years beyond 2033/34 we will deliver

additional housing capacity above our London Plan target across the remainder new Local Plan period, even if the borough only meets the lower range of the proposed Local Plan housing target. The above analysis shows that Newham's issues with meeting the London Plan housing target are as a result of delays to site delivery, rather than the borough lacking sufficient identified land to deliver our housing target.

*Table 9: Completions against the London Plan period (London Plan period shaded grey)*

<b>Financial year</b>	<b>Completions</b>	<b>Cumulative total</b>	<b>Financial year</b>	<b>Completions</b>	<b>Cumulative total</b>
<b>19/20</b>	3,841	3,841	<b>27/28</b>	3,858	26,486
<b>20/21</b>	2,348	6,189	<b>28/29</b>	4,836	31,322
<b>21/22</b>	3,240	9,429	<b>29/30</b>	4,765	36,087
<b>22/23</b>	2,217	11,646	<b>30/31</b>	4,069	40,156
<b>23/24</b>	3,142	14,788	<b>31/32</b>	3,453	43,609
<b>24/25</b>	2,326	17,114	<b>32/33</b>	3,291	46,900
<b>25/26</b>	2,740	19,854	<b>33/34</b>	4,287	<b><u>51,187</u></b>
<b>26/27</b>	2,774	22,628			

- 4.9.5. Indeed, more homes may be delivered in the borough than the lower range of the borough's housing target, noting that we have assumed a relatively conservative delivery rate for some of the borough's largest schemes. Newham also has additional potential sources of future supply from potential site allocations that were discounted from capacity testing given the lack of certainty around delivery within the Submission Local Plan period.
- 4.9.6. A number of the largest of the borough's site allocations are located on land owned by the Greater London Authority, with many of these sites anticipated to be subject to strategic level investment to optimise housing delivery aligned with London's housing needs. As such, Newham should see an ambitious level of housing delivery over the course of the new Local Plan period. We will also continue to undertake regular monitoring of our housing delivery to measure our progress against both our adopted and proposed housing target set out in the Submission Local Plan.

*Table 10: LB Newham<sup>7</sup> proposed Local Plan Housing Trajectory and Delivery against London Plan (2021) target (as at 01/07/25, subject to continual updating)*

Year	Policy Year	Annual Figures			Cumulative Figures			Managed Delivery Figures	
		Housing Target	Net Additional dwellings <sup>8</sup> (projected completions)	Surplus/ deficit	Cumulative Net Additional Dwellings (actual or projected completions)	Cumulative Target	Cumulative surplus/ deficit	Managed Delivery Target (cumulative deficit annualised over remaining plan period in addition to housing target)	Surplus/ deficit
19/20	1	4,760	3,841	-919	3,841	4,760	-919	4,760	-919
20/21	2	4,760	2,348	-2,412	6,189	9,520	-3,331	4,862	-2,514
21/22	3	4,760	3,240	-1,520	9,429	14,280	-4,851	5,176	-1,936
22/23	4	4,760	2,217	-2,543	11,646	19,040	-7,394	5,453	-3,236
23/24	5	4,760	3,142	-1,618	14,788	23,800	-9,012	5,992	-2,850
24/25	6	4,760	2,326	-2,434	17,114	28,560	-11,446	6,562	-4,236
25/26	7	4,760	2,740	-2,020	19,854	33,320	-13,466	7,622	-4,882
26/27	8	4,760	2,774	-1,986	22,628	38,080	-15,452	9,249	-6,475
27/28	9	4,760	3,858	-902	26,486	42,840	-16,354	12,486	-8,628
28/29	10	4,760	4,836	76	31,322	47,600	-16,278	21,114	-16,278
<b>TOTALS</b>		<b>47,600</b>	<b>31,322</b>						

Source: Kibana 2025/Planning Policy Monitoring Figures 2024

<sup>7</sup> This includes sites formerly under the administration of the London Legacy Development Corporation.

<sup>8</sup> As outlined at paragraph 4.1.9 in the London Plan (March 2021), net non-self-contained accommodation for students is measured on a 2.5:1 ratio, net non-self-contained accommodation for older people (C2 Use Class) is counted on the basis of a 1:1 ratio, and all other net non-self-contained communal accommodation counts towards meeting housing targets on the basis of a 1.8:1 ratio.

**Table 11: LB Newham<sup>9</sup> proposed Local Plan Housing Trajectory and Delivery against the proposed Local Plan housing target (as at 01/07/25, subject to continual updating)**

Year	Policy Year	Annual Figures			Cumulative Figures			Managed Delivery Figures	
		Housing Target <sup>10</sup>	Net Additional dwellings <sup>11</sup> (projected completions)	Surplus/ deficit	Cumulative Net Additional Dwellings (actual or projected completions)	Cumulative Target	Cumulative surplus/ deficit	Managed Delivery Target (cumulative deficit annualised over remaining plan period in addition to housing target)	Surplus/ deficit
23/24	1	2,957	3,142	185	3,142	2,957	185	2,957	185
24/25	2	2,957	2,326	-631	5,468	5,914	-446	2,944	-618
25/26	3	2,957	2,740	-217	8,208	8,871	-663	2,991	-251
26/27	4	2,957	2,774	-183	10,982	11,828	-846	3,012	-238
27/28	5	2,957	3,858	901	14,840	14,785	55	3,034	824
28/29	6	3,966	4,836	870	19,676	18,751	925	3,961	876
29/30	7	3,966	4,765	799	24,441	22,717	1,724	3,863	902
30/31	8	3,966	4,069	103	28,510	26,683	1,827	3,751	319
31/32	9	3,966	3,453	-513	31,963	30,649	1,314	3,705	-252
32/33	10	3,966	3,291	-675	35,254	34,615	639	3,747	-456
33/34	11	3,716	4,287	571	39,541	38,331	1,210	3,588	699
34/35	12	3,716	3,978	262	43,519	42,047	1,472	3,414	565
35/36	13	3,716	3,806	90	47,325	45,763	1,562	3,225	581
36/37	14	3,716	3,816	100	51,141	49,479	1,662	2,935	881
37/38	15	3,716	3,835	119	54,976	53,195	1,781	2,054	1,781
<b>TOTALS</b>		<b>53,195<sup>12</sup></b>	<b>54,976</b>						

Source: Kibana 2025/Planning Policy Monitoring Figures 2024

<sup>9</sup> This includes sites formerly under the administration of the London Legacy Development Corporation.

<sup>10</sup> As per the stepped trajectory housing requirement figure proposed in the modification to the Newham Submission Local Plan for the Inspector's consideration.

<sup>11</sup> As outlined at paragraph 4.1.9 in the London Plan (March 2021), net non-self-contained accommodation for students is measured on a 2.5:1 ratio, net non-self-contained accommodation for older people (C2 Use Class) is counted on the basis of a 1:1 ratio, and all other net non-self-contained communal accommodation counts towards meeting housing targets on the basis of a 1.8:1 ratio.

<sup>12</sup> It is noted there is a unit difference between this figure and the lower range housing target (53,194). This is because the target is calculated using the average of the proposed delivery over each five year phase of the housing target. This has resulted in the target figure being rounded up by two and one units respectively in the short and medium term phases of the plan period, and rounded down by two in the long term phase of the plan period.



*Table 12: Five Year Land Supply against London Plan (2021) target*

5 year supply target	23,800
Forecast Provision	16,534
Surplus/Deficit	-7,266
Percentage of housing supply above/below housing requirement	-30.53%
Years' worth of housing capacity	3.47
20% buffer required for Newham London Plan Housing Target	3,280
5 year supply target plus buffer	27,080
Surplus/Deficit	-10,546
Percentage of housing supply above/below housing requirement including 20% buffer	-38.94%
Years' worth of housing capacity including 20% buffer	3.05
Previous years' shortfall (LBN only, minus LLDC)	-6,021
Previous years' shortfall (LLDC)	-2,991
Shortfall plus 5 year supply target	32,812
Forecast Provision	16,534
Surplus/Deficit	-16,278
20% buffer required for both Newham London Plan Housing Target and Shortfall	4,484
Shortfall plus 5 year supply target plus buffer	37,296
Surplus/Deficit	-20,762
Percentage of housing supply above/below housing requirement plus shortfall and including 20% buffer	-55.67%
Years' worth of housing capacity plus shortfall and including 20% buffer	2.22

*Table 13: Five Year Land Supply Summary against the proposed Local Plan housing target*

5 year supply target	15,794
Forecast Provision	16,534
Surplus/Deficit	740
Percentage of housing supply above/below housing requirement	+4.69%
Years' worth of housing capacity	5.23
2023/24 shortfall/surplus	+244

Table 14: Five Year Land Supply Sites

5 Year Housing Supply as at July 2025							
(subject to continual amendment as updated information becomes available. Figures are net and are most reliable at the Borough level and when totalled across 5 years).							
	5 year	24/25	25/26	26/27	27/28	28/29	Ward
		1	2	3	4	5	
<b>VERY SMALL SITES</b>							
Total Small Sites <0.25ha	1900	380	380	380	380	380	All
<b>LARGE SITES (&gt;=5 net units)</b>							
Cyprus 4 (23/00840/FUL)	215	0	0	0	0	215	Beckton
West End Car Park (20/00544/FUL)	321	107	107	107	0	0	Royal Victoria
Land At Thameside West And Carlsberg Tetley (18/03557/OUT)	400	0	0	0	200	200	Royal Victoria
Silvertown Quays (14/01605/OUT, 19/02657/REM, 24/02043/REM and 24/02648/REM)	1000	200	200	200	200	200	Royal Victoria
Deanston Wharf (16/00527/FUL)	562	562	0	0	0	0	Royal Victoria
Land Adjacent West Silvertown DLR Station (19/01791/FUL)	252	0	126	126	0	0	Royal Victoria

Land At 6 To 8 Boxley St 1 Fort St And 279 To 291 North Woolwich Road (22/00650/FUL)	81	0	0	81	0	0	Royal Victoria
Etap Accor Hotel (18/00678/FUL)	140	140	0	0	0	0	Royal Albert
Unit 3 Thames Road (20/01046/FUL)	161	0	161	0	0	0	Royal Albert
Land Corner Of Store Road And Pier Road (17/02106/FUL)	163	0	163	0	0	0	Royal Albert
Land Adjacent To Woolwich Foot Tunnel Entrance (22/02662/FUL)	350	0	0	0	175	175	Royal Albert
Albert Island (20/00051/FUL)	16	0	16	0	0	0	Royal Albert
Canning Town Riverside (23/00038/FUL)	290	0	0	0	145	145	Canning Town North
Twelvetrees Crescent (23/02033/OUT)	200	0	0	0	0	200	Canning Town North
Stephenson Street Parcellforce (17/01847/OUT)	1199	200	201	201	201	396	Canning Town North
Manor Road (18/03506/OUT & 23/00606/REM)	449	0	0	290	0	159	Canning Town North
Vincent Street (22/02615/LA3)	147	0	0	147	0	0	Canning Town South
Areas 7 and 1C Barking Road (22/00694/REM)	151	0	151	0	0	0	Canning Town South
Barking Road (24/00395/FUL)	-1	0	0	-1	0	0	Canning Town North
27-37 Lascars Avenue and 14-23 Royal Albert Quay (24/02307/FUL)	91	0	0	0	0	91	Royal Albert North
Keying Way (24/00440/FUL)	251	0	0	0	125	126	Royal Albert North

Pool Street East and Pool Street West (17/00235/OUT_LLDC & 18/00425/REM)	333	0	0	0	166	167	Stratford and Maryland
IQL North (23/00441/FUL)	182	0	0	0	0	182	Stratford and Maryland
Westfield Shopping Centre Plot M2 Car Park C (24/00113/FUL)	208	0	0	0	104	104	Stratford and Maryland
Vandome Close (22/02157/LA3)	55	0	55	0	0	0	Custom House
Leslie and Freemasons Road (22/01853/FUL)	95	0	95	0	0	0	Custom House
Custom House Phase 1 (23/00610/OUT)	295	0	0	0	147	148	Custom House
Royal Road and Leyes Road (23/00023/OUT)	116	0	116	0	0	0	Custom House
Stratford Waterfront North (24/00067/REM & 24/00068/NMA)	326	0	0	0	160	166	Stratford Olympic Park
Chobham Farm (17/00175/REM)	202	0	0	202	0	0	Stratford Olympic Park
Chobham Farm North (24/00063/FUL)	106	0	0	0	106	0	Stratford Olympic Park
East Village (14/00066/REM, 14/00056/REM & 14/00141/REM)	409	0	0	0	0	409	Stratford Olympic Park
International Quarter North (23/00441/FUL)	168	0	0	0	0	168	Stratford Olympic Park
International Quarter South (21/00416/FUL)	350	0	0	175	175	0	Stratford Olympic Park
Stratford International Bus Layover Site (19/00391/FUL)	380	380	0	0	0	0	Stratford Olympic Park
68-70 High Street (24/01905/FUL)	177	0	0	0	0	177	Stratford

Rick Roberts Way Gasworks (23/00411/NMA)	247	0	0	0	123	124	Stratford
Sugar House Lane (12/00336/LTGOUT)	738	147	147	148	148	148	Stratford
Greater Carpenters District (22/00360/OUT)	144	0	0	0	0	144	Stratford
James Riley Point (21/00543/FUL_LLDC)	4	0	0	4	0	0	Stratford
Odelia Court (21/00172/PRNSDB)	22	0	22	0	0	0	Stratford
Vulcan Wharf (20/00307/FUL)	457	0	0	152	152	153	Stratford
Barbers Road (21/00574/OUT)	316	0	0	0	158	158	Stratford
Pudding Mill Phase 3 (21/00460/FUL)	171	0	0	0	0	171	Stratford
Land at Legacy Wharf Phase 2 (21/00395/FUL)	196	0	0	196	0	0	Stratford
Pudding Mill (14/00422/FUL)	245	122	123	0	0	0	Stratford
Marshgate Lane (23/00305/FUL)	126	0	0	0	126	0	Stratford
302-312 High Street (23/00456/FUL)	183	0	0	183	0	0	Stratford
East Village Plot N16 (23/00101/FUL)	202	0	0	0	202	0	Stratford
Great Eastern Road (22/00178/FUL)	381	0	0	0	381	0	Stratford
Jubilee House (21/00483/FUL)	286	0	286	0	0	0	Stratford

Poland House (20/00310/FUL)	73	73	0	0	0	0	Stratford
Grove Crescent Road (21/02975/FUL)	159	0	159	0	0	0	Stratford
Portway (23/02532/COU)	2	0	2	0	0	0	West Ham
John Street (21/01628/LA3)	70	0	70	0	0	0	West Ham
Abbey House (24/00028/REF)	74	0	0	0	74	0	Stratford
High Street North (10/00694 & 21/01428/FUL)	9	0	9	0	0	0	East Ham
Burgoynes Depot & Melford Road (21/03054/LA3)	48	0	48	0	0	0	East Ham South
Land At 67 To 113 Folkestone Road (23/02048/LA3 )	8	0	0	8	0	0	East Ham South
25 Folkestone Road (21/02978/FUL)	26	0	26	0	0	0	East Ham South
Durning Hall (20/02849/FUL)	78	0	0	78	0	0	Forest Gate South
365-367 Romford Road (20/01326/FUL)	41	0	0	41	0	0	Forest Gate South
Margery Park (07/90023/VARODA)	-4	0	-4	0	0	0	Forest Gate South
UEL Water Lane (23/00790/FUL)	260	0	0	0	130	130	Forest Gate South
Rear of 330 Romford Road (19/02679/FUL)	15	15	0	0	0	0	Green Street West
Greenhill Centre (21/01737/LA3)	81	0	81	0	0	0	Manor Park

Land At 2 To 16 High Street And 2 Upper Road (22/01709/FUL)	56	0	0	56	0	0	Plaistow West & Canning Town East
Glory House (21/00830/FUL)	80	0	0	0	80	0	Plaistow West & Canning Town East
<b>Total</b>	<b>16534</b>	<b>2326</b>	<b>2740</b>	<b>2774</b>	<b>3858</b>	<b>4836</b>	