

Local Plan Soundness and Quality Assessment

July 2025

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a ‘mock’ examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 ‘key questions’ in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the ‘tests’ as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#) and other statements of national planning policy, where relevant.

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
	Growth Strategy	
A	In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area	<p>Newham's spatial strategy is underpinned by the concept of creating well-connected neighbourhoods, through which every resident in Newham can live in a well-connected, accessible and inclusive neighbourhood. The Submission Local Plan sub-divides the borough into 17 neighbourhoods, providing the ability to shape growth at a local scale. Development will be directed to all neighbourhoods, with significant growth directed to:</p> <ul style="list-style-type: none"> • six neighbourhoods within the Royal Docks and Beckton Riverside Opportunity Area (N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North, N4 Canning Town, N5 Custom House and N17 Gallions Reach); • two neighbourhoods within the cross boundary Poplar Riverside Opportunity Area (N6 Manor Road and N7 Three Mills); and • N8 Stratford and Maryland (part of which is within the Olympic Legacy Opportunity Area). <p>Economic growth will be achieved through protecting and intensifying existing industrial capacity at designated employment locations, directing office floorspace to town centres and requiring new employment floorspace on identified site allocations.</p>
B	In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update	<p>The Submission Local Plan has identified the key areas of growth, the main areas where opportunities exist to accommodate new development or to increase the density of existing, to create new places and to bring benefits to local communities.</p> <p>This exercise is set out in Newham's Housing Trajectory Methodology Note (2025). The strategy for delivering growth has regard to a number of factors including:</p> <ul style="list-style-type: none"> • London Plan designations - Royal Docks and Beckton Riverside Opportunity Area and the cross boundary Poplar Riverside and Olympic Legacy Opportunity Areas • The London Strategic Housing Land Availability Assessment 2017 • Sites with planning permission or within the planning pipeline • Availability - deliverability of the site / land owners desire to develop • Achievability - the viability of delivering new development

¹ All evidence base documents, the Statements of Common Ground (SoCG) and the Duty to Cooperate Statement, and the consultation report mentioned in this assessment can be found in our examination library: <https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-examination/3>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		<ul style="list-style-type: none"> • The impact of development on the built character of the borough which is considered through the borough's Characterisation Study (2024) and design-led capacity testing • Transport – accessibility and impact on the existing network • National and local designations such as heritage or environmental considerations • Flood risk • Alternative designations - the need to protect existing uses such as industrial land, waste sites or infrastructure
C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	<p>The Neighbourhoods section of the Submission Local Plan, and associated site allocations, sets out the main sites for growth across the borough. The site allocations set out the specific infrastructure needed to support delivery. Policy W4 (Utilities and Digital Connectivity Infrastructure) requires all major development proposals to undertake engagement with utility providers to ensure utilities networks and connections can serve the development and to demonstrate sufficient utility infrastructure capacity to meet the demand of development taking into consideration the cumulative impact of current and proposed developments.</p> <p>Key areas of growth include the six neighbourhoods within the Royal Docks and Beckton Riverside Opportunity Area:</p> <ul style="list-style-type: none"> • N1 North Woolwich <ul style="list-style-type: none"> ○ Key infrastructure: refurbishment of the former Tate Institute to provide a community facility and/or affordable workspace, protecting and the existing and potential capacity and operability of Thames Refinery Wharf, enhancing the role of North Woolwich local centre, a new health centre at N1.SA2, green space, play space, community growing space, protecting and supporting enhancements to playing pitches and sports courts at Royal Victoria Gardens. ○ Site allocations: N1.SA1 North Woolwich Gateway, N1.SA2 Rymill Street • N2 Royal Victoria <ul style="list-style-type: none"> ○ Key infrastructure: expanding the Silvertown local centre, new local centres at N2.SA4 and N2.SA3, a new neighbourhood parade at N2.SA2, consolidating safeguarded wharves at Peruvian Wharf and Royal Primrose Wharf, while protecting their existing and potential capacity and operability, as well the Thames Refinery Wharf in North Woolwich and Angerstein, Murphy's and Riverside Wharves in the London Borough of Greenwich, improving existing DLR stations, a new DLR station as part of N2.SA4, three primary schools with childcare provision at N2.SA1, N2.SA3 and N2.SA4, green space,

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>play space, community growing space, protecting and supporting enhancements to sports courts at Oasis Academy Silvertown and Lyle Park West, a sports-lit multiuse games area at N2.SA2, new bridge connection across the dock to Custom House, two new bridge connections (N2.SA4) Trinity Buoy to Thames Wharf Bridge and the land to the south of the Lower East Crossing to Good Luck Hope Bridge, safeguard space for River Pier Landing facilities and a River Pier and automated vacuum waste collection systems at N2.SA1, N2.SA3, N2.SA4.</p> <ul style="list-style-type: none"> ○ Site allocations: N2.SA1 Silvertown Quays, N2.SA2 Lyle Park West, N2.SA3 Connaught Riverside, N2.SA4 Thameside West, N2.SA5 Excel Western Entrance <ul style="list-style-type: none"> ● N3 Royal Albert North <ul style="list-style-type: none"> ○ Key infrastructure: supporting the re-use of Compressor House for community uses, upgrade of Royal Albert DLR station, green space, play space, community growing space, supporting improvements to the University of East London campus, including protecting and supporting enhancements to playing pitches, and a sports-lit multiuse games area at N3.SA1. ○ Site allocation: N3.SA1 Royal Albert North ● N4 Canning Town <ul style="list-style-type: none"> ○ Key infrastructure: supporting improvements to increase the capacity of Canning Town Station and the reconfiguration of the bus station as part of N4.SA4, green space, play space, community growing space, a new bridge connection from Mayer Parry site to Leven Road, a new pedestrian bridge connection from Limmo site to Brunel Street Works, new river wall at N4.SA4 and N4.SA5, a new leisure centre in Canning Town District Centre, protecting and supporting enhancements to sports courts at East London Rugby Club, Hermit Recreation Ground, Rokeby School, Memorial Recreation Ground, Star Primary School and Eastlea Community School, supporting an urban sport offer at Star Park and requiring sports-lit multi-use games area at N4.SA1. ○ Site allocations: N4.SA1 Canning Town East, N4.SA2 Silvertown Way East, N4.SA3 Canning Town Holiday Inn, N4.SA4 Limmo, N3.SA5 Canning Town Riverside ● N5 Custom House <ul style="list-style-type: none"> ○ Key infrastructure: an all-through school at N5.SA2 and a SEND school at N5.SA4, green space, play space, community growing space, a new health facility at N5.SA1, protecting and supporting enhancements to sports courts and to the PlayZone at Canning Town Recreation Ground, the

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>playing pitch and sports courts at Royal Docks Academy and supporting an urban sports offer at King George V Park and requiring sports-lit multi-use games area at N4.SA2.</p> <ul style="list-style-type: none"> ○ Site allocations: N5.SA1 Custom House Land surrounding Freemasons Road, N5.SA2 Custom House Coolfin North, N5.SA3 Custom House Land between Russel Road and Muplin Road, N5.SA4 Royal Road <ul style="list-style-type: none"> ● N17 Gallions Reach <ul style="list-style-type: none"> ○ Key infrastructure: extension of the DLR and creation of a new DLR station, reconfiguring the existing out-of-centre retail offer to create a new town centre, new neighbourhood parade, new electricity substation, new community facilities (including a leisure centre (either at N17 Gallions Reach or N11 Beckton) and faith facilities, protecting and supporting enhancements to playing pitches at Powerleague, an urban sport offer and sports-lit multi use games area, and a primary school with childcare provision, a secondary school, a new health facility all at N17.SA1, green space, play space, community growing space, safeguarding space for River Pier Landing and an automated vacuum waste collection system at N17.SA1. ○ Site allocation: N17.SA1 Beckton Riverside <p>Significant growth will also come from the two neighbourhoods which form part of the cross boundary Poplar Riverside Opportunity Area:</p> <ul style="list-style-type: none"> ● N6 Manor Road <ul style="list-style-type: none"> ○ Key infrastructure: new cross-river bridges across the River Lea, including the Lochnagar Bridge, new residential moorings. ○ No site allocations in this neighbourhood. Growth will be delivered through optimisation and intensification of industrial land for modern industrial uses. ● N7 Three Mills <ul style="list-style-type: none"> ○ Key infrastructure: new local centres at N7.SA2, N7.SA1 and N7.SA3, improvement at West Ham Station, new bridge connections to West Ham Station at N7.SA1 and N7.SA2, new bridges across Manor Road and linking the Sugar House Island peninsula to Bromley-by-Bow and to Three Mills, new residential moorings, a new secondary school at N7.SA2, a new health facility at N7.SA2, green space, play space, community growing space and an automated vacuum waste collection system at N7.SA2.

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<ul style="list-style-type: none"> Site allocations: N7.SA1 Abbey Mills, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks, N7.SA3 Sugar House Island <p>In addition, significant growth will come from the following neighbourhood (part of which is within the Olympic Legacy Opportunity Area), supported by a redesigned Stratford Station:</p> <ul style="list-style-type: none"> N8 Stratford and Maryland <ul style="list-style-type: none"> Key infrastructure: creating a new local centre at N8.SA9, increasing the capacity of Stratford Station, requiring and supporting new and improved connections at Bow Goods Yard to the A12, a SEND school at N8.SA7, green space, play space, community growing space, protecting and supporting enhancements to playing pitches and sports courts at Chobham Academy and the athletics provision at London Marathon Community Track and supporting the on-going development and enhancement of the Lee Valley VeloPark on the Queen Elizabeth Olympic Park, a sports-lit Multi-Use Games Area at N8.SA7, three new health care facilities (new health facilities at N8.SA1, N8.SA3 and N8.SA9), expansion of an existing facilities at Sir Ludwig Guttmann health and wellbeing centre), sports hall provision at N8.SA7. Site allocations: N8.SA1 Stratford Central, N8.SA2 Stratford Station, N8.SA3 Greater Carpenters District, N8.SA4 Stratford High Street Bingo Hall, N8.SA5 Stratford Town Centre West, N8.SA6 Stratford Waterfront South, N8.SA7 Rick Roberts Way, N8.SA8 Bridgewater Road, N8.SA9 Pudding Mill, N8.SA10 Chobham Farm North <p>Infrastructure requirements are outlined in each of the neighbourhood policies and listed in more detail in each of the site allocations. Infrastructure requirements are also outlined in the Infrastructure Delivery Plan (2024).</p>				
1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is 'an appropriate strategy' within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Submission Local Plan clearly articulate the strategy of where and how sustainable development will be delivered and that is 'an appropriate strategy' and is justified within the context of paragraph 35 of the NPPF supported by a list of evidence base documents. The policies in the Submission Local Plan have been assessed against reasonable alternatives as part of Newham's Sustainability Appraisal. This ensures that any potential effects in relation to the				

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>social, economic and environmental factors is reduced and mitigated. Alongside the Sustainability Appraisal an Equalities Impact Assessment (EQIA), a Health Impact Assessment (HIA) and a Habitats Regulation Assessment (HRA) have also been produced and published as part of the Integrated Impact Assessment.</p> <p>The Plan's spatial strategy is set out clearly in the Vision section and Policy BFN1, which also illustrate how sustainable development will be delivered. Development will make the best use of land and optimise sites for growth. The key locations for growth are shown in the key diagram and further detail is provided in part 2 of the Submission Local Plan, Neighbourhoods section and individual site allocations.</p> <p>Policy BFN1.2 (Spatial strategy) sets out that development will make the best use of land, optimise sites and deliver sustainable development by:</p> <ul style="list-style-type: none"> a. applying a design-led approach which responds to the site's surrounding character and context; and; b. supporting tall buildings in the borough's Tall Building Zones; and c. conserving and enhancing the borough's heritage assets and settings; and d. delivering zero carbon, climate resilient and nature-friendly developments. <p>The Neighbourhoods section sets out the infrastructure required to support growth which is set out in more detail in the site allocations, which are also in this section of the Submission Local Plan. The Council undertook a rigorous assessment of these site allocations, as set out in Newham's Housing Trajectory Methodology Note (2025). All of the site allocations have been considered as part of the Council's Integrated Impact Assessment (IIA). They have also been subject to a Flood Risk Sequential Test.</p> <p>The Plan's topic based policies also consider where and how sustainable development will be delivered:</p> <ul style="list-style-type: none"> • Building a Fairer Newham Chapter: sets out the spatial strategy for Newham to 2038. The spatial strategy identifies the location, scale and uses of development that will come forward in Newham and demonstrates how this growth will meet the needs of Newham's current and future population. • Design Chapter: the policies have been built on, and should be read alongside, the Newham Characterisation Study (2024), which has identified what makes Newham special – its physical and social characteristics and potential for positive change. This chapter also sets out the approach to design-led site capacity optimisation and the appropriate locations for tall buildings.

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> • High Streets Chapter: considers development within Newham’s highstreets and confirms the town centre first approach for new development. • The Social Infrastructure Chapter seeks to protect and deliver additional facilities to support growth over the plan period. • Inclusive Economy Chapter: guides development to reflect Newham’s economic future, which is guided by the principals of Community Wealth Building. This means building a fair economy that secures social, economic and environmental benefits for all. The approach delivers growth that meets strategic and local economic needs while tackling key economic challenges faced by residents and businesses. The policies also direct economic growth to appropriate and safeguarded locations. • Homes Chapter sets: out the Council’s expectations with regard to housing delivery. • The Green and Water Spaces Chapter: outlines requirements for protecting and enhancing green and water spaces, creating biodiverse areas, and developing blue/green corridors. It promotes public access to recreation, supports sustainability, addresses climate change and biodiversity challenges, enhances health and wellbeing, and boosts economic growth by making the borough more liveable and attractive. • The Climate Emergency Chapter: addresses improving the environment and air quality, reducing emissions, mitigating and adapting to the impacts of climate change and minimising and managing the risks of flooding. The policies ensure that development in the borough contributes to improved health for residents, a better local environment, and climate resilience. • The Transport Chapter: outlines requirements to meet the borough’s transportation needs and support proposed growth in a sustainable way. • The Waste and Utilities Chapter: outlines requirements to facilitate the provision of facilities necessary for delivering critical functions such as providing heat, power, digital connectivity and communications, drainage, water supply and wastewater removal, and to ensure the quality and capacity of infrastructure to meet demand. These services are essential for quality of life and a functioning economy. <p>Overall, the Submission Local Plan facilitate sustainable development and are justified as supported by a list of evidence.</p> <p>Implications of taking no further action: No further action required</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	Reason for score: <p>The Plan clearly identifies amount of development across the 17 neighbourhoods in the borough, which are set out in the neighbourhood section and their corresponding site allocations, outlining the development principles and infrastructure required to support growth. Newham will enable a net increase of between 53,194 and 54,976 quality residential units between 2023 and 2038.</p> <p>The level of growth in each neighbourhood proposed is justified as it is informed by the Newham Characterisation Study (2024). Chapter 07, part 2 of the study sets out the borough-wide approach to determining an appropriate level of growth. It directs major regeneration to areas identified as to be transformed and moderate uplift in density in conserve and enhance areas. The locations of these areas are highlighted in the conserve, enhance, transform map on p.153 of the Newham Characterisation Study.</p> <p>The site allocation methodology and site capacity testing is consistent with the NPPF and London Plan, and is outlined in the Site Allocation and Housing Trajectory Methodology Note (2025). Although the capacity testing and the relevant figures have not been published on a site by site basis as the exact scale of housing development will come forward depending on further detailed site design work undertaken through the application process, the overall housing target is informed by the capacity testing.</p> <p>The Plan also supports sustainable employment growth, with a target to deliver 335,000 sqm of industrial floorspace and a minimum of 90,000 sqm of office floorspace over the Plan period to 2038. These will be achieved by directing employment floorspace to a hierarchy of employment locations with their corresponding industrial intensity and/or appropriateness for office as set out in the Inclusive Economy policies. The amount and type of development and locations are informed by the Employment Land Review (2022) with site audits carried out to understand the baseline conditions and potential for development.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>The Town Centres network comprises of designations across the town centre hierarchy of town and local centres or neighbourhood parades, which are justified by the Retail and Leisure Study (2022). The boundary of these centres are also informed by the Town Centre Network Review Methodology Papers (2022) and its subsequent update (2024).</p> <p>Tall building zones are identified in the Plan to support developments in different height bands. The tall building locations are informed by a review process as outlined in the Tall Building Annex (2024) which is in line with the London Plan requirements.</p> <p>The level of growth proposed in the Submission Local Plan as stated above is tested to be deliverable in the Viability Assessment (2024).</p> <p>Implications of taking no further action: No further action required</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
3.	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>The housing target in the Submission Local Plan is justified as below, having been calculated using realistic rates of housing delivery.</p> <p>Newham can meet its housing needs figure set under the most recently published standard method (December 2024) i.e. 2,358 homes per year. However, Newham is a London Borough where the housing target is set through the Spatial Development Strategy i.e. the London Plan 2021, rather than the standard method set out in national planning guidance. The London Plan sets housing targets for each borough based on housing capacity not individual borough need.</p>				

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>Regarding the long term housing target, although Newham is unable to meet the London Plan housing target by the end of the London Plan period in 2028/29, the Council will exceed the London Plan target by the end of the proposed plan period in 2037/38. This is due to the delays to the delivery of allocated sites within our adopted Local Plan and a significant amount of Newham's housing target that is now anticipated to be delivered from 2028/29 onwards.</p> <p>Due to the above, Newham is also unable to demonstrate a 5-year housing land supply target when measured against the London Plan housing target and this position is worsened with the buffer applied. As such, the Council has set out a stepped housing trajectory reflective of the anticipated phasing of developments based on developer expectations and a local level methodology for phasing. Yet, there are sufficient sites identified for Newham to exceed both its London Plan target in the long term and our housing needs figure identified by the standard method. These are elaborated below:</p> <p><u>Long term housing target</u></p> <p>Newham's housing target set out in the London Plan seeks to deliver 47,600 homes between 2019/20 and 2028/29. This target comprises of 32,800 homes to be delivered in the part of the borough outside the area previously administered by the London Legacy Development Corporation (LLDC), plus an additional 14,800 homes in the part of the borough previously administered by the LLDC. This target was informed by the findings of the Greater London Authority's Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment, both of which were published in 2017.</p> <p>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. Noting updates to phasing following the close of the 23/24 Starts and Completions exercise, Modifications 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. This range target is capacity-derived, based on approved planning permission figures, design-led capacity testing of site allocations, capacity assumptions from the Greater London Authority's 2017 Strategic Housing Land Availability Assessment and capacity assumptions from lapsed application sites. The range target reflects higher and lower capacity assumptions for a number of site allocations, for example, where a site has been design-led capacity tested but also benefits from an extant planning permission. 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</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>figures also reflect smaller boundary options or reduced housing capacity assumptions if key infrastructure that unlock higher density housing development are not delivered.</p> <p>The Plan identifies a significant level of housing capacity in the borough which exceeds our London Plan housing target. While we are unable to meet the 2021 London Plan housing target within the period of the London Plan (which runs until 2028/29), the inability to meet the 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. The housing delivery projections suggest Newham will meet the London Plan housing target by 2033/34. In the years beyond 2033/34, Newham 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 housing target set out in Policy H1 (Meeting housing needs) of the Plan. By the end of the proposed plan period in 2037/38, the Council will exceed the London Plan target with a surplus of 17,240 units (based on the lower range housing trajectory).</p> <p><u>5-year housing land supply</u></p> <p>Newham is unable to demonstrate a 5-year housing land supply when measured against the adopted London Plan housing target. Our calculation of the 5-year land supply against the London Plan target includes shortfall from previous years added to the 5-year supply target (the Sedgefield approach). 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. A buffer has been applied to Newham's London Plan 5-year land supply target. A 20% buffer has been applied to Newham's portion of the London Plan target noting our 2023 Housing Delivery Test consequence (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. Taking the shortfall and buffer into consideration Newham only has a land supply of 2.16 years. The composition of Newham's housing target is explained above, under 'Long term housing target'.</p> <p>In order to address the considerable shortfall against our London Plan target, Newham intends to address our shortfall over the course of the emerging Local Plan period (the Liverpool method). A 5-year land supply calculation measured against the proposed housing target in the Submission Local Plan is also set out in the methodology note.</p>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>This shows that Newham has sufficient housing capacity to meet the borough's Local Plan capacity-based housing target over the course of the proposed plan period to 2037/38 with a surplus of 1,934 units above the lower range housing target, as well as a 5-year land supply of 5.16 years measured against the Plan's housing target.</p> <p>The Site Allocation and Housing Trajectory Methodology Note 2025 provides a summary of the Council's Housing Trajectory and 5-year land supply position respectively. It provides two 5-year land supply calculations, one against the borough's adopted housing target set out in the London Plan and one against the proposed housing target set out in Newham's Submission Local Plan.</p> <p>Due to the above reasons, the Council set out a stepped housing trajectory reflective of the anticipated phasing of developments based on developer expectations and a local level methodology for phasing. However, there are sufficient sites identified for Newham to exceed both its London Plan target in the long term and our housing needs figure identified by the standard method.</p> <p>The detailed methodology in determining the housing target in the Plan is outlined in the Site Allocation and Housing Trajectory Methodology (2025).</p> <p>Implications of taking no further action: No further action required</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
4.	Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Not applicable to the Borough.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
5.	Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The detailed methodology for site allocation selection and assessment is set out in Chapter 2.3 of the Site Allocation and Housing Trajectory Methodology Note (2025). All site allocations have been made by consistently applying the 4-stage approach, following the methodology outlined in the Planning Practice Guidance. Stages 1 and 2 identified and assessed sites' development potential by assessing their suitability, availability and achievability, based on the Local Plan evidence base. This assessment was used during stage 3 to make a decision on whether a site should be allocated in the 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. In addition, relevant Local Plan evidence base documents, as listed in section 2.9 of the Site Allocation and Housing Trajectory Methodology Note, were used as the basis of site assessment to inform land use and infrastructure requirements for different site allocations. Employment land designations were informed by the Employment Land Review (2022). Site audits were undertaken to review the suitability of the existing employment allocations for their continued designation and scope for intensification. The Proposed New Employment Land Designation and Boundary Amendments (2024) outlined the justifications for changes in designations or boundaries of employment sites from the adopted Local Plan. Each site allocation and the employment land designations have gone through a Sustainability Appraisal within the Integrated Impact Assessment (IIA) (2024) using a holistic approach. A Viability Assessment (2024) has also been undertaken. The whole plan are tested compatible with the IIA objectives and are viable to be delivered.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: There are no designated neighbourhood areas in Newham.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The site allocations, which are outlined in the neighbourhood section of the Plan, include the following sections: site profile, map, development principles, design principles, infrastructure requirements, and phasing and implementation. Each site allocation and their respective allocated uses has gone through capacity testing. However, the capacity figures are not outlined in the Plan. This is to provide flexibility along with necessary requirements on what the Council would like to see delivered such as allocated land uses and infrastructure requirements. The total number of units expected to be delivered across site allocations and the rationale in setting out the target are outlined in the Site Allocation and Housing Trajectory Methodology Note (2025). Housing delivery will be monitored annually through the Housing Delivery Test and the Authority Monitoring Report against the 5 years housing target.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
D	<p>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</p> <p>List these targets and the evidence source for this 'need' target?</p>	<p>The Submission Local Plan's target for employment is 10,000 jobs (4,800 in the office sector and 5,200 in industrial/ warehousing and logistics sectors) and 335,000 sqm of industrial floorspace and a minimum of 90,000 sqm of office floorspace over the Plan period to 2038. The need for employment floor space is justified and informed by the Employment Land Review (2022).</p> <p>The Retail and Leisure Study (2022) identifies a limited need for additional retail and commercial floorspace across the borough. Given the limited scale of this need, the Council does not identify a specific target for the main town centre uses.</p> <p>Newham's waste management requirements, namely the safeguarding of waste capacity to meet the London Plan (2021) waste apportionment targets (383,000 in 2021 and 407,000 in 2041), are informed by the emerging Joint East London Waste Plan. This is being produced in collaboration with the east London Boroughs of Havering, Barking and Dagenham and Redbridge. The waste policies in the Submission Local Plan refer to the emerging Joint Waste Plan (which is at Regulation 19 stage), and adopts the approach to safeguarding set out in the London Plan until such time as the new East London Joint Waste Plan can be used in decision making.</p>				
8.	<p>Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p><u>Employment floorspace and jobs</u></p> <p>The employment floorspace and jobs growth target will be achieved primarily through industrial intensification on designated employment land, namely the Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs), and through the protection of existing capacity and delivery of new employment floorspace at Local Mixed Use Areas (LMUAs) and Micro Opportunity Businesses Areas (MBOAs), as well as other non-designated employment sites including town centres and specific site allocations. These locations are identified in Policy J1 and the Map of Newham's Employment Designations. The Plan's employment designations have undergone site audits to assess the sites' potential for the continued delivery of employment capacity on each site in the Employment Land Review (2022).</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p><u>Retail and leisure need</u></p> <p>Newham's retail and leisure need is directed to the hierarchy of town centres. This is made up of six existing town centres of regional significance: Stratford, East Ham, Green Street, Forest Gate, Canning Town and East Beckton, together with a network of local centres. These town centres are complemented by a network of = neighbourhood parades. The Local Plan designates more of existing high street frontages for protection, and also designates the creation of a new town centre at Beckton Riverside, a series of new local centres to support growth, and new neighbourhood parades to address gaps in the network. These designations will meet the need for additional convenience retail in the borough. Also, a number of site allocations within existing or planned town and local centres include requirements to deliver food stores. As there is limited need for additional comparison retail floorspace, alongside there being significant planned development within existing and planned centres, there is no specific delivery target for new comparison floorspace at these locations, and there is no need to accommodate edge of centre or out of centre sites. Similarly, the growth of leisure main town centre uses will be directed to the network of existing and new town centres. These locations are protected by the High Street Policies with their boundary reviewed under the Town Centre Network Review Methodology Papers (2022) & (2024), which is supported by the recommendations of the Retail and Leisure Study (2022) and subsequent topic papers (2024)</p> <p><u>Waste</u></p> <p>The updated Joint East London Waste Plan will set out which safeguarded waste sites should be retained and ensure the waste apportionment target is met.</p> <p>Implications of taking no further action: No further action required</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>An Infrastructure Delivery Plan (IDP) (2024) has been produced to support the Submission Local Plan, which outlines infrastructure needs for the growth to be delivered over the Plan period and their cost and funding mechanism.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>Policies BFN4 (Developer contributions and infrastructure delivery) and W4 (Utilities and Digital Connectivity Infrastructure) set out that the infrastructure projects in the IDP will be supported and require development to enable infrastructure delivery, including where relevant, through financial contributions. Infrastructure requirements are also set out in the Plan within the Neighbourhoods section and further detail is provided in each site allocation.</p> <p>The infrastructure needs in the IDP, set out in site allocations and the Neighbourhood policies have been identified through engagement with infrastructure providers and as informed by the Plan's suite of evidence base documents, including the Community Facilities Needs Assessment (2022), Built Leisure Needs Assessment (2025), Playing Pitch Strategy (2025), Green and Water Infrastructure Strategy (2025) and the Sustainable Transport Strategy (2024).</p> <p>Policy BFN4 (Developer contributions and infrastructure delivery) requires any large scale development, at or a density over 250 units/ hectare or for major developments on site allocations are requirement to submit an Infrastructure Sufficiency Statement to ensure they provide sufficient infrastructure to support the proposed scale of development.</p>				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
10.	<p>Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?</p> <p>Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>The Infrastructure Delivery Plan (IDP) (2024) identifies the infrastructure that is necessary to support the planned growth over the Local Plan period. It sets out their estimated cost, timing, delivery body, funding mechanism and any funding gap. It also includes additional infrastructure projects which are required in each site allocation and the Neighbourhood policies. Policies BFN4 and W4 set out that infrastructure projects in the IDP will be supported and require development to enable infrastructure delivery, including where relevant, through financial contributions. Policies BFN4 also support the exploration of additional sources of funding to enable the delivery of the infrastructure as required in the Plan.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		The IDP will be updated regularly and the Council will work with infrastructure providers to identify and secure funding through recognised or new funding mechanisms, to ensure infrastructure is deliverable.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
	Process and Outcomes (see also Toolkit Parts 2 and 3)					
E	What are the cross boundary strategic matters affecting your local plan policies update? List these.	<p>The cross boundary strategic matters affecting the Plan and being discussed with the neighbouring boroughs and the Greater London Authority are:</p> <ul style="list-style-type: none">• Plan making and delivery• Housing• Employment• Town Centres• Transport• Water supply and waste water supply• Flood risk and water sustainability• Waste management• Social Infrastructure• Design, including tall buildings• Green and water infrastructure• Climate change <p>These matters are all identified and set out in detail within the Council’s Statements of Common Ground (SoCG) and the Duty to Cooperate Statement (and its Addendum).</p>				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Statements of Common Ground (SoCG) and the Duty to Cooperate Statement (and its Addendum) identifies the cross boundary strategic issues, duty to cooperate bodies, key discussion points and the outcomes of discussions, highlighting the areas of agreement and of difference.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
F	Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence? <i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i>	The following aspects of the Local Plan are not in conformity with the national policy but can be robustly defended on the basis of local evidence: Policy H1 (Meeting housing needs) Newham is able to meet its housing needs figure set under the i.e. 2,358 homes per year. However, based on the most up-to-date trajectory, Newham is unable to meet our London Plan 10-year housing target within the London Plan period, or demonstrate a 5-year land supply when measured against the London Plan housing target. See our response to in key question 12 below. Policy H10 (Gypsy and Traveller accommodation) Planning Policy for Traveller Sites sets out national requirement for local planning authorities to make their own assessment of need for traveller sites and meet the need through the identification of land for sites. Newham is unable to identify a sufficient number of sites to meet the accommodation needs of the borough's Gypsy and Traveller community. The Planning Team undertook a Call for Sites in 2021. However, during this process no sites were submitted to deliver Gypsy and Traveller pitches, and therefore no Gypsy and Traveller sites were considered to be available from this exercise. Prior to submission, the Council has also undertaken a comprehensive review of Council-owned land, which concluded that of the limited sites identified, few were of a scale and in a location that wasn't susceptible to flood risk. Duty to cooperate discussions have also confirmed that no neighbouring authorities are able to assist in meeting our Gypsy and Traveller accommodation needs. Noting these challenges regarding allocating suitable sites for pitches, we consider our policy approach is justified. The policy sets requirements for the				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>assessment of sites should they come forward over the plan period, and we have also identified one site as being safeguarded for Gypsy and Traveller pitches, which could form a small extension to the existing Gypsy and Traveller accommodation site in the borough at Parkway Crescent.</p> <p>Policy CE2 (Zero Carbon Development) In December 2023, a written ministerial statement (WMS) titled "Planning – Local Energy Efficiency Standards Update" was made – stating that <i>"the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations"</i>. The WMS does not prevent higher standards from being set if development remains viable and if technical calculations are made using a specific method.</p> <p>An open legal advice namely "Legal basis for planning policies delivering Net Zero Carbon developments 2024" commissioned by Etude (the consultants who undertook the Climate Change Evidence Base for the Council sets out that the WMS 2023 does not change the ability for councils to set their own standards – stating that if <i>"there is a robust evidence base – a reasoned and robustly costed rationale – it is open to examining inspectors, in the exercise of their planning judgment, to determine that policies based on Policy Option 2 are consistent with national policy on climate change mitigation and the net zero obligation, and, to the extent that there would be deviation from the 2023 WMS, that can be justified on the evidence and does not prevent overall consistency of the proposed local plan with national policy"</i>.</p> <p>The Climate Change Evidence Base sets out why Policy CE2 is necessary and the methodology behind them. Both the Climate Change Evidence Base and the viability assessment indicate how the policy is justified, achievable, deliverable and viable.</p>				
12.	Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Greater London Authority (GLA) raised the following general conformity issues during Regulation 19 consultation:				

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p><u>Housing target</u></p> <p>The borough's housing target is set out in Policy H1 of the London Plan (2021). Newham and the part of the borough previously administered by the London Legacy Development Corporation 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. 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. Noting updates to phasing following the close of the 23/24 Starts and Completions exercise, Modifications 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.</p> <p>Newham is unable to demonstrate a 5-year housing land supply when measured against the adopted London Plan housing target and together with the buffer requirement. The inability to meet the 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. Hence, the new Local Plan introduces a stepped trajectory to reflect the significant amount of Newham's housing target that is now anticipated to be delivered from 2028/29 onwards. The London Plan target will be met in 2033/34. In the years beyond 2033/34, the Council will deliver additional housing capacity above Newham's London Plan target across the remainder Plan period, even if the borough only meets the lower range housing target set out in Policy H1 (Meeting housing needs) of the Plan.</p> <p>The detail methodology in determining the housing target in the Plan is outlined in the Site Allocation and Housing Trajectory Methodology (2025). For more detailed justification please see our response to key question 3 above.</p> <p><u>Affordable housing target</u></p> <p>The Submission Local Plan takes a different approach to affordable housing from London Plan Policies H4, H5 and H6. Newham's affordable housing target requires developments on individual sites with the capacity to deliver ten dwelling houses (C3) or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing, which is higher than the requirement in the London Plan. The target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by both our strategic housing market assessment and the fact that Newham has the highest number of residents in temporary accommodation in the country. While the viability assessment that supports the plan shows viability</p>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>challenges in meeting this target, the testing was undertaken in a particularly challenging viability context, with construction costs and interest rates being abnormally high. We consider that as economic circumstances improve, the policy will become easier to deliver over the plan period. Policy H3 (Affordable housing) also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the policy target, thereby ensuring the plan remains effective and deliverable.</p> <p>Apart from the above conformity issues, the GLA have raised concerns in additional areas including the following, which have been addressed in the Statement of Common Ground (SoCG):</p> <ul style="list-style-type: none"> • Capacity figures for site allocations • The publication of capacity figures for each site allocation • Prioritisation of developer contributions towards public transport; • The approach to employment land; • The height parameters of tall building zones; • Waste management capacity as part of site allocations; and • How air quality issues are addressed in neighbourhood policies. <p>Implications of taking no further action: The GLA will continue to raise conformity issues with the London Plan</p> <p>Mitigation / Action required (if necessary) to move scale to right: Continue engagement with the GLA</p> <p>Reviewer Comments:</p>				
13.	Is the local plan policies update: <ul style="list-style-type: none"> • in conformity with any 'higher level' plans prepared by the Council; and • properly reflecting provisions of any made neighbourhood plan? 	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes. The Plan is in conformity with other council plans including: <ul style="list-style-type: none"> • Building a Fairer Newham • Towards a Better Newham Covid-19 Recovery Strategy • Just Transition Plan • Community Wealth Building Strategy 				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<ul style="list-style-type: none"> 50 Steps to a Healthier Newham The Newham Young People's Charter 2022 <p>There are no made neighbourhoods plan in Newham currently.</p> <p>Implications of taking no further action: No further action required</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
14.	Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: <p>The Issues and Options, Regulation 18 and Regulation 19 Consultation Reports outline the consultation the Council has conducted to date on the Local Plan, including the methods used to inform stakeholders, the comments received and the Council's response to the representations made. This demonstrates that the consultations have been delivered in compliance with the Town and Country Planning (Local Plan) (England) Regulations 2012. The approach to the consultation was informed by the requirements of Newham's Statement of Community Involvement, published in October 2021 as well as its previous version during the Issues and Options stage.</p> <p>The Issues and Options consultation report set out the summary of comments and the Regulation 18 and 19 consultation reports set out all the comments received at each stage. The Regulation 19 Consultation Report submitted to PINS in accordance with Regulation 22 includes all duly made comments received regarding the soundness and legal compliance of the plan at Regulation 19 stage.</p>				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Integrated Impact Assessment (IIA) has been developed alongside the Plan, incorporating the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). The SA and SEA assesses the policies against the IIA framework by policy topic section in the Plan with an appraisal matrix produced for each section and each policy assessed individually within that matrix, using a scoring system. The Neighbourhood policies and site allocations have also been assessed. The appraisal matrix identifies potential effects for each policy and whether or not they are considered significant. Appendix E of the IIA provides consideration of reasonable alternatives in relation to specific policies and sets out information on how any reasonable alternatives were identified under each topic and why the preferred option was selected and others rejected.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) adequately assesses the policies against the IIA framework by policy topics in the Plan with an appraisal matrix produced for each section and each policy assessed individually within that matrix, using a scoring system. The Neighbourhood policies have also been				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>assessed. The appraisal matrix identifies potential effects for each policy and whether or not they are considered significant.</p> <p>Likely significant social, environmental and economic effects were identified, including those listed in the SEA Directive, as relevant. Sections 5.5 to 5.8 of the report summarise the appraisal of the sustainability performance of the Plan. The Vision and Key Objectives, policies and sites in the Submission Local Plan are appraised. Detailed appraisal matrices for policies in the Plan are presented in Appendix F and G, while sites are discussed in Appendix H. Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed. Positive and negative effects are considered within the appraisal matrices identified above and within Sections 5.5 to 5.8. Potential effects are identified in the short, medium and long-term.</p> <p>Likely secondary, cumulative and synergistic effects are identified, and inter-relationships between effects are considered where practicable. The prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds, which are identified where appropriate.</p> <p>Implications of taking no further action: No further action required</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: <p>The process of conducting the Sustainability Assessment (SA), as a core part of the IIA, is iterative in nature which has been followed throughout the Plan, with comments on how the resulting favoured Local Plan policies have been reached. The SA appraisal, on the Regulation 19 Local Plan, concluded that none of the Plan's vision and objectives are incompatible with the IIA Objectives. For thematic policies, no instances were identified where the options were judged to perform better than the proposed policy approach in the Plan. Tables 5.16 and 5.17 present suggestions for mitigation and enhancement of the thematic policies and Neighbourhood policies that have been identified and the Council's response.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: No further action required Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: The process of conducting the Equalities Impact Assessment (EqIA), as a core part of the IIA, is iterative in nature which has been followed throughout the Plan. It includes comments on how the resulting favoured Local Plan policies have been reached. The assessment concluded that the Plan exhibits due regard to the Council's Public Sector Equality Duty. There are policies in the Local Plan which, while not focussed on people who share Protected Characteristics, could have significant positive effects to policies relating to the provision of a range of housing, employment (e.g. J1 'Employment and Growth', green infrastructure (e.g. GWS1 'Green spaces'), transport (e.g. T2 'Local Transport') and community infrastructure. The EqIA also references the Council's Statement of Community Involvement (2022) which sets out efforts to reach groups that the Council has previously been less successful in reaching – such as digitally excluded people. No changes to the Local Plan policies were required as a result of the EqIA.				
		Implications of taking no further action: No further action required Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The process of conducting the Habitats Regulations Assessment (HRA), as a core part of the IIA, is iterative in nature which has been followed throughout the Plan. Overall, taking into account specific and cross-cutting policy-based mitigation and avoidance measures that have been incorporated into the Plan, the Habitats Regulations Assessment (HRA) concluded that the Plan will have no adverse effect on the integrity of any European sites, alone or in combination. The consideration of 'in combination' effects is explained in Section 2.7 of the HRA.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Taking into account specific and cross-cutting policy-based mitigation and avoidance measures that have been incorporated into the Plan, the Habitats Regulations Assessment (HRA) concluded that the Plan will have no adverse effect on the integrity of any European sites, alone or in combination. Where required, the Local Plan has adequately identified the mitigation measures which are outlined in our response to in key question 21 below.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		Reviewer Comments:
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update	<p>No changes to the Local Plan policies were required as a result of the Habitats Regulations Assessment (HRA). The initial assessment reflected that the vast majority of the planning policies contained in the Local Plan are categorised as ‘no effect’ or ‘no significant effect’ – having no significant effects on any European sites, alone or in combination due to the absence of effect pathways. With the requirements for further assessment in the Local Plan policies as appropriate, the overarching conclusion of the HRA demonstrated that no change to the Local Plan is required.</p> <p>Table 3.2 in the HRA sets out the European sites within the scope of the HRA:</p> <ul style="list-style-type: none"> • Epping Forest SAC • Lee Valley SPA • Lee Valley Ramsar • Wimbledon Common SAC • Richmond Park SAC • Thames Estuary and Marshes Ramsar • Thames Estuary and Marshes SPA <p>Overall, the assessment ascertained that the vast majority of the planning policies contained in the Local Plan are categorised as ‘no effect’ or ‘no significant effect’ policies (see Appendix C of the HRA). However, the policies in Table 4.3 of the HRA were explored further through appropriate assessment. In summary these are:</p> <ul style="list-style-type: none"> • BFN1: Spatial strategy • CE1: Environmental design and delivery • CE6: Air quality • GWS3: Biodiversity, urban greening, and access to nature • T1: Strategic Transport • T2: Local Transport • T3: Transport Behaviour Change • T4: Servicing a development

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>In addition, the following policies were considered specifically in relation to air quality:</p> <ul style="list-style-type: none"> • BFN1 - Spatial Strategy; • J1 - Employment and growth; • J2 - New employment floorspace; • W2 - New or Improved Waste Sites; • H1 - Meeting Housing Needs; • H10 - Gypsy and Traveller Accommodation; • T1 – Strategic Transport; and • Neighbourhood policies (based on their location/proximity to Epping Forest SAC): N7 (Three Mills), N8 (Stratford and Maryland), and N15 (Forest Gate). <p>Appropriate assessments were undertaken for those aspects where effect pathways are present (in combination air quality and visitor pressure effects), taking into account specific and cross-cutting policy-based mitigation and avoidance measures that have been incorporated into the Plan. These appropriate assessments employed additional analyses and data to resolve uncertainties present at the initial screening, and concluded that the Local Plan will have no adverse effects on the integrity of any European sites, alone or in combination.</p> <p><u>Visitor pressure on Epping Forest SAC</u></p> <p>The Local Plan includes several policies that will reduce or mitigate recreational pressure on the Epping Forest SAC, including Policies GWS1 - GWS5. In particular:</p> <ul style="list-style-type: none"> • Policy GWS1 requires that development provide or help to deliver easy access to a network of high-quality green spaces, and safeguards existing greenspace. • Policy GWS3 states that: The Epping Forest Special Area of Conservation will be protected and enhanced by ensuring that development within 6.2km of the boundary of Epping Forest Special Area of Conservation demonstrates that, if necessary, measures are put in place to avoid or mitigate any potential adverse effects, through: <ul style="list-style-type: none"> a) developments of new net additional residential homes contributing towards the delivery of the agreed Strategic Access Management and Monitoring Strategy; and

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>					
		b) developments of new net additional residential homes contributing to the delivery of Newham’s Epping Forest Special Area of Conservation Recreation Mitigation Strategy.					
		Natural England (NE) has set out in its Duty to Cooperate Statement with the Council that it is in agreement that the Epping Forest Special Area of Conservation Recreation Mitigation Strategy (2025) provides a suitable strategy to mitigate recreational pressure in Epping Forest SAC. New net additional residential homes delivered as a result of the Local Plan will also contribute towards the delivery of the agreed Strategic Access Management and Monitoring Strategy and the Epping Forest Special Area of Conservation Recreation Mitigation Strategy.					
		<u>Air quality – impact on Epping Forest SAC</u> The impact on Epping Forest SAC will be mitigated through the following requirements included in several policies: <ul style="list-style-type: none">• CE6: Air quality (requires developments mitigate and improve air quality).• T2: Local transport (supports car-free development and improved local connectivity to neighbourhood facilities).• T3: Transport behaviour change (includes provisions intended to reduce car use).					
		Based on the available data set out in the Air Quality Information Report to Inform the HRA, produced by Newham Council (February 2025), it is considered that the Local Plan will have no adverse effects on the integrity of Epping Forest SAC, alone or in combination. NE confirmed that they agreed with this conclusion following a review of the Post Regulation 19 Update Report (February 2025) to the air quality information carried out by the Council.					
		Implications of taking no further action: No further action required					
		Mitigation / Action required (if necessary) to move scale to right: N/A					
		Reviewer Comments:					
	Housing Strategy						
22.	Can you demonstrate that the policies and proposed allocations in your local plan	-2	-1	0	+1	+2	
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
	<p>policies update meet your housing requirement in full and that this can be achieved as a minimum? If not <i>[for instance, because another local authority has agreed to plan for your unmet need]</i>, can you explain and robustly justify why?</p>	<p>Reason for score:</p> <p>Newham can meet its housing needs figure set under the most recently published standard method (December 2024) i.e. 2,358 homes per year. However, Newham is a London Borough where the housing target is set through the Spatial Development Strategy i.e. the London Plan 2021, rather than the standard method set out in national planning guidance. The London Plan sets housing targets for each borough based on housing capacity not individual borough need.</p> <p>Newham's housing target set out in the London Plan seeks to deliver 47,600 homes between 2019/20 and 2028/29. This target comprises of 32,800 homes to be delivered in the part of the borough outside the area previously administered by the London Legacy Development Corporation (LLDC), plus an additional 14,800 homes in the part of the borough previously administered by the LLDC. This target was informed by the findings of the Greater London Authority's Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment, both of which were published in 2017.</p> <p>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. Noting updates to phasing following the close of the 23/24 Starts and Completions exercise, Modifications 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. This range target is capacity-derived, based on approved planning permission figures, design-led capacity testing of site allocations, capacity assumptions from the Greater London Authority's 2017 Strategic Housing Land Availability Assessment and capacity assumptions from lapsed application sites. The range target reflects higher and lower capacity assumptions for a number of site allocations, for example, where a site has been design-led capacity tested but also benefits from an extant planning permission. 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 infrastructure that unlock higher density housing development are not delivered.</p> <p>The Plan identifies a significant level of housing capacity in the borough which exceeds our London Plan housing target. While we are unable to meet the 2021 London Plan housing target within the period of the London Plan (which runs until 2028/29), the inability to meet the London Plan housing target is not because the borough lacks</p>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>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. The housing delivery projections suggest Newham will meet the London Plan housing target by 2033/34. In the years beyond 2033/34, Newham 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 housing target set out in Policy H1 (Meeting housing needs) of the Plan. By the end of the proposed plan period in 2037/38, the Council will exceed the London Plan target with a surplus of 17,240 units (based on the lower range housing trajectory).</p> <p>The Site Allocation and Housing Trajectory Methodology (2025) demonstrates that Newham has the capacity required to meet our overall housing target as outlined in the Plan. It also sets out the justification for the Plan to introduce a stepped trajectory developed from the London Plan 5-year housing target, as well as how the stepped trajectory target will be met.</p> <p>The Council has sought to maximise delivery and does not consider that any other alternatives would be sound, as confirmed by the Integrated Impact Assessment (IIA).</p> <p>Implications of taking no further action: No further action required</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
G	<i>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</i>	<p>No, there has been no request to accommodate unmet need from neighbouring authorities. The housing target across London is distributed to individual London Boroughs under the London Plan. The Council has engaged with neighbouring boroughs to outline our respective positions with regards to meeting the housing targets set out in the London Plan. The details of the engagement process and the outcomes are set out in the Statements of Common Ground with each neighbouring authority (London Borough (LB) of Tower Hamlets, LB of Waltham Forest, LB of Redbridge, LB of Barking and Dagenham and Royal Borough of Greenwich).</p>				
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably do so?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reason for score: See response to G above, not applicable. Each London Borough adjacent to Newham is seeking to provide for its own London Plan target as a minimum, whilst some boroughs, such as Barking and Dagenham and Waltham Forest are seeking to go higher than the London Plan target, informed by their own evidence on objectively assessed needs. The detail of the engagement process and the other borough's positions are outlined in the Statements of Common Ground with neighbouring authorities. Implications of taking no further action: No further action required Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period? Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Plan introduces a stepped housing trajectory approach, which is set out in policy H1. This will enable the Council to meet the London Plan target of 47,600 homes by 2033/34. In the years beyond 2033/34, Newham 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 housing target set out in Policy H1 (Meeting housing needs) of the Submission Local Plan. By the end of the proposed plan period in 2037/38, the Council will exceed the London Plan target with a surplus of 17,240 units (based on the lower range housing trajectory). The Site Allocation and Housing Trajectory Methodology (2025) sets out the justifications for the Plan to introduce a stepped trajectory developed from the London Plan housing target, as well as how the stepped trajectory target will be met. Implications of taking no further action: No further action required Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.	Reason for score: <p>The Submission Local Plan provides a 5-year supply of specific deliverable sites and beyond this 5-year period sites are developable based on the phasing methodology outlined in Table 8 of the Site Allocation and Housing Trajectory Methodology Note 2025.</p> <p>Newham is unable to demonstrate a 5-year housing land supply when measured against the adopted London Plan housing target. Our calculation of the 5-year land supply against the London Plan target includes shortfall from previous years added to the 5-year supply target (the Sedgefield approach). 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. A buffer has been applied to Newham's London Plan 5-year land supply target. A 20% buffer has been applied to Newham's portion of the London Plan target noting our 2023 Housing Delivery Test consequence (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. Taking the shortfall and buffer into consideration Newham only has a land supply of 2.16 years.</p> <p>In order to address the considerable shortfall against our London Plan target, Newham intends to address our shortfall over the course of the emerging Local Plan period (the Liverpool method). A 5-year land supply calculation measured against the proposed housing target in the Submission Local Plan is also set out in the methodology note. This shows that Newham has sufficient housing capacity to meet the borough's Local Plan capacity-based housing target over the course of the proposed plan period to 2037/38 with a surplus of 1,934 units above the lower range housing target, as well as a 5-year land supply of 5.16 years measured against the Plan's housing target.</p> <p>The Site Allocation and Housing Trajectory Methodology Note 2025 provides a summary of the Council's Housing Trajectory and 5 year land supply position respectively. It provides two 5-year land supply calculations, one against</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>the borough's adopted housing target set out in the London Plan and one against the proposed housing target set out in Newham's Submission Local Plan.</p> <p>Due to the above reasons, the Council set out a stepped housing trajectory reflective of the anticipated phasing of developments based on developer expectations and a local level methodology for phasing. However, there are sufficient sites identified for Newham to exceed both its London Plan target in the long term and our housing needs figure identified by the standard method.</p>				
		Implications of taking no further action: The GLA will continue to raise conformity issue with the London Plan Mitigation / Action required (if necessary) to move scale to right: Continue engagement with the GLA Reviewer Comments:				
26.	Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: 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 1,934 units above the lower range housing target, as well as a 5-year land supply of 5.55 years measured against the Plan's housing target. This is set out in detail in the Site Allocation and Housing Trajectory Methodology (2025).				
		Implications of taking no further action: No further action required Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
27.	Is the Council reliant on the delivery of any 'windfall' sites (sites not specifically identified in the development plan) during the plan period and if so, how many and	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
	<p>when? Is there compelling evidence to confirm that such sites will continue to come forward?</p>	<p>The significant majority of sites included in Newham’s housing trajectory are non-windfall sites. Identified 5-year land supply sites (deliverable sites) primarily comprise consented schemes and applications with a resolution to grant from a development committee. Sites with planning permission or a resolution to grant are listed individually within the 5-year supply. The remaining projected capacity is from small sites (below 0.25ha). Across the rest of the plan period, developable windfall sites include small sites and other windfall sites including lapsed permissions and SHLAA sites without planning permission.</p> <p>Of these windfall sites, small sites make up a significant portion, with London Plan Policy H2 setting a target of 3,800 due to be delivered by 2028/29. 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. The deliverability of Newham’s small site target is supported by a small site intensification design guide as part of the Characterisation Study (2024) 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. It is anticipated that Newham should be in a good position to meet this small sites target facilitated by the Policy H1 (Meeting housing needs) in the Plan and the delivery of design-led capacity optimisation in line with the new design guide.</p> <p>In addition to our small site target, our housing target also includes SHLAA sites without planning permission as developable windfall sites. Their capacity reflects housing numbers determined through the 2017 London Strategic Housing Land Availability Assessment, which were assessed as being suitable for residential development. Any capacity from 2017 SHLAA sites that have planning permission, have a resolution to grant, or are on site allocations without a planning permission or resolution to grant have been disaggregated from the SHLAA totals. 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 Plan’s new policy position that resists co-location on protected employment 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 is set out in detail in the Site Allocation and Housing Trajectory Methodology.</p> <p>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 with lapsed permissions are assumed to be delivered in the medium to long term. Sites that have received landowner engagement suggesting they will be delivered in the next</p>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		5-10 years have been phased starting from the medium term phase of the plan period. Other lapsed permission sites have been phased starting from the long term phase of the plan period. The phasing methodology of the deliverable and developable sites is outlined in Table 8 of the Site Allocation and Housing Trajectory Methodology Note 2025. Implications of taking no further action: No further action required Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Housing policies (H1 to H11) in the Local Plan clearly set out the size, type and tenure of housing required. These policies are based on the findings in the Strategic Housing Market Assessment (SHMA) and Gypsy and Traveller Accommodation Assessment (GTAA) (2022). These studies identify the type of homes required by all residents (tenure and size) to ensure the delivery of homes which meet local need. The assessment includes a review of specialist housing needs, including for older residents, specialist housing, student housing and for Gypsy and Traveller pitches.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Submission Local Plan address the needs of different groups in the community. It includes the following policies:				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> • H1 (Meeting housing needs) sets out the overall housing target and requirements for general needs housing. • H2 (Protecting and improving existing housing) sets out requirements for protecting and improving existing housing of different sizes, types and tenures, in particular family housing. • H3 (Affordable housing) sets out requirements for affordable housing which reflects Newham's expectations for affordable housing delivery, recognising the pressing need to deliver genuinely affordable homes to meet both Newham and London's wider housing needs. • H4 (Housing mix) requires the delivery of a mix of housing types, sizes and tenures to help meet Newham's housing needs. • H5 (Build to Rent housing) sets out the quality standards for Build to Rent housing and requires the delivery of affordable housing. • H6 (Supported and specialist housing) seeks to meet the housing needs of different groups who may require specialist or supported housing, including people with learning disabilities or autism, care experienced children, care leavers and homeless people by protecting and delivering high-quality housing that meets needs and are in locations that are well-connected, that meet the safeguarding needs of residents and have access to adequate supporting facilities. • H7 (Specialist housing for older people) supplements the requirements of H6, encouraging the provision of specialist housing for older people where the housing meets need, is of a high-quality and is provided in locations with access to supporting facilities. • H8 (Purpose-built student accommodation) seeks to support the delivery of purpose-built student accommodation, helping to ensure this accommodation provision contributes to neighbourhoods having a mix and balance of different housing types and sizes. • H9 (Houses in multiple occupation and large-scale purpose-built shared living) seeks to ensure that shared accommodation is delivered in suitable locations, is neighbourly and contributes to the supply of affordable accommodation within the borough. • H10 (Gypsy and Traveller accommodation) seeks to ensure that the housing needs of Gypsy, Traveller and Travelling Showpeople' communities are met. • H11 (Housing design quality) ensures that housing developments of a range of types are designed for long term comfort and flexibility, and ease of maintenance taken into account the end-users need. <p>Implications of taking no further action: No further action required</p>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Policy H3 (Affordable housing) sets out overall affordable housing and tenure mix targets that developments are expected to meet on site, with a strategic target seeking to deliver 60% of all new homes across the plan period as affordable housing, requiring residential developments on individual sites with the capacity to deliver 10 C3 dwelling houses or more to provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This target is informed by the Newham Strategic Housing Market Assessment (SHMA) which sets out that 54 per cent of housing need across the plan period is for affordable homes, with 66 per cent of this need being for social rent homes. The affordable homes target will be delivered through various strategies as directed in the Plan, including significant areas of land in public ownership where the delivery of genuinely affordable housing will be prioritised, delivering Newham's estate regeneration and affordable homes programmes and through delivering affordable housing on all sites of 10 or more residential units. The prioritisation of social rent dwellings will also make sure we are addressing the needs of our residents, as these homes will only be available to people on Newham's housing waiting list. Policy H3 allows for provision of affordable housing off site or payment in lieu of affordable housing in limited circumstances where delivery on site is not deliverable.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
		-2	-1	0	+1	+2
30.	<p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</p>					

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
31.	Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence? Does the local plan policies update make adequate provision for the identified needs?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: As part of our Local Plan evidence base Newham has prepared a Gypsy and Traveller Accommodation Assessment(2022) which established that there was no need for new pitches for households that meet the Planning Policy for Traveller Sites definition of Gypsies and Travellers. However, the evidence found a need for 23 pitches in the borough for households that did not meet the Planning Policy for Traveller Sites definition. Following the update of the Planning Policy for Traveller Sites in December 2023, these 23 pitches of need have to be considered by the Council. There is currently 1 site with 15 existing pitches safeguarded under the Submission Local Plan The safeguarding of this site does not count towards meeting identified future need of 23 pitches, albeit there is scope to extend the site by two pitches to the south of the allocation. Newham is unlikely to be able to deliver permanent pitches on identified site allocations in the Local Plan given that majority of the site allocations are located on land susceptible to flood risk. More detail is set out in the Gypsy and Traveller Accommodation Topic Paper 2025. Newham is aware of the emerging evidence base at the regional level on Gypsy and Traveller accommodation needs across London, and will continue to work with the Greater London Authority in the production of this evidence base. The Council will seek to meet identified need for gypsies and travellers' sites through our local appraisal and the emerging regional evidence base namely the Council's Small Sites Options Appraisals and Modular construction programme. Policy H10 (Gypsy and Traveller accommodation) allows for developments of new pitches to come forward in appropriate locations that have access to necessary services and infrastructure. The Local Planning Authority will continue to work with colleagues in housing to meet the accommodation needs of Newham's Gypsy and Traveller community where sites are proposed to be brought forward on publicly owned land.				
		Implications of taking no further action: The GLA will continue to raise conformity issue with the London Plan				
		Mitigation / Action required (if necessary) to move scale to right: Continue to work with the Greater London Authority in the production of the new evidence base; and				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		continue to work with housing colleagues on identifying Gypsy and Traveller sites on publicly owned land.				
		Reviewer Comments:				
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: No, a 5-year supply cannot be provided. See response to key question 31.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	There is currently 1 site with 15 existing pitches safeguarded under the Submission Local Plan The safeguarding of this site does not count towards meeting identified future need of 23 pitches, albeit there is scope to extend the site by two pitches to the south of the allocation. See response to key question 31. The timescale for delivery is not yet known and will be subject to review led by the Council.				
	Justified approaches to plan policy and content					
33.	Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text? [You may wish to check each policy setting a threshold]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: All thresholds in the Submission Local Plan are justified based on the scale of development at which impacts become more significant and/or where mitigation can be proportionately delivered, as supported by evidence, and/or the				

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>requirements in the national policy, the London Plan or the adopted Local Plan. All policies in the Plan have been subject to viability assessment and have been tested viable. In all cases, thresholds are clearly set out in the main policy text with additional detail provided in the implementation text. The rationale for each threshold is clearly explained in the relevant justification text or references are made to relevant supporting documents where thresholds are carried over. The policies set thresholds which trigger specific policy requirements includes the following and they are all positively prepared, justified and effective:</p> <p>Policy BFN2.2 (Co-designed masterplanning) sets a threshold for major applications and applications on site allocations to undertake co-designed site masterplanning – this threshold is used in the adopted Local Plan and successfully ensures high quality coordinated development occurs across the borough.</p> <p>Policy BFN3.2 (Social Value and Health Impact Assessment - delivering social value, health and wellbeing) sets a threshold for major development and proposals with potential health and social value issue to undertake a Social Value and Health Impact Assessment screening assessment. It is considered that the policy takes a proportionate approach to the need to undertake a Social Value-Health Impact Assessment (SV-HIA). The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA.</p> <p>Policy BFN4.4 (Developer contributions and infrastructure delivery) sets a threshold for applications for developments at, or over, 250 units/hectare density or for major developments on site allocations to provide an Infrastructure Sufficiency Statement. This threshold is in conformity with London Plan policy D2 and relates to the scale of development we consider to be high density (see Policy D3 in the Local Plan) and the important relationship between masterplanning and consideration of infrastructure capacity. The Local Plan is supported by a significant amount of evidence considering the delivery of the infrastructure required to ensure sustainable development. This is inevitably based on assumptions regarding development density. To ensure the effectiveness and flexibility of the Plan, in cases where density increases above such levels, it is vital that developments demonstrate their development is still supported by suitable infrastructure, in line with paragraph 11 and footnote 39 of the NPPF.</p> <p>Policy D1.4 (Design standards) sets a threshold for temporary buildings that are likely to be used for three years or more to be design to a higher standard – this threshold is justified by current development management expertise, where a larger number of temporary permissions in Newham have been granted for 3 years, and where this</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>timeframe is considered a proportionate in terms of balancing viability considerations with amenity and other potential impacts of temporary development.</p> <p>Policy D2.2 (Public realm net gain) sets a threshold for all new-build and change of use developments that are on sites with a street-facing boundary of at least 25m to make positive qualitative contributions to the public realm. The threshold of 25m represents, in a historic context, the length of frontage of a 5-unit terrace, which is considered proportionally long enough to influence the perception of people navigating the public realm. The Characterisation Study (2024) has also highlighted that, broadly, shopping parades of between 5-10 units tend to be more successful than smaller runs (See para. 9.2.1 - Provide local uses that support well-connected neighbourhoods).</p> <p>Policy D2.3 (Public realm net gain) sets a threshold for all major developments referable to the Mayor of London to make contribution on public realm enhancement beyond the site and the maintenance thereof– this threshold is justified by the approach to Active Travel Zone assessments that TfL apply, with the larger scale of development usually having a higher potential impact on their area and also able to accommodate more complex mitigation interventions, beyond their red line, such as through S278 contributions.</p> <p>Policy D2.4 (Public realm net gain) sets thresholds for non-referable major developments and for minor residential developments of five or more gross new build units to consider making improvements to the public realm in the neighbourhood beyond the site. The thresholds are justified by the same criteria of D2.2 (above), where 5 units or more are likely to generate a more substantial street-facing frontage that then would benefit from improved public realm.</p> <p>Policy D3.2 (Design-led site capacity optimisation) sets a threshold for major new-build developments to support compact urban block formats, which is recommended by in the National Design Guide and National Model Design Code.</p> <p>Policy D3.7 (Design-led site capacity optimisation) sets a threshold for (major) residential developments where a density at or over 250 units/ha is considered appropriate for the site, to demonstrate additional commitment to design quality standards – this density threshold is derived from an understanding of increased impacts as well as opportunities provided by higher density development (as per the evidence base supporting the policy), proportionately applied to the density scales of major development typically seen in Newham on its strategic sites, where design considerations play a larger part in the development management process. The local context set out</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>through the Characterisation Study (2024) justifies a different approach to that of the London Plan, where ‘higher density’ is defined as 350u/ha.</p> <p>Policy D8.1 (Archaeological Priority Areas) sets a threshold for all major applications on sites at or smaller than 0.5ha within Archaeological Priority Areas Tiers 1 to 3, and all major applications on sites larger than 0.5ha anywhere in the borough to submit an archaeological desk-based assessment and if necessary a field evaluation. These thresholds are justified by established Greater London Archaeology Advisory Service requirements.</p> <p>Policy HS2.2 (Managing new and existing Town and Local Centres) sets out a minimum percentage threshold of Use Class E units as a proportion of all units for primary shopping areas, which is at least 90 per cent of ground floor units in Stratford Town Centre, and at least 80 per cent of ground floor units in all other town and local centres. The thresholds are justified by the Retail and Leisure Study (2022) recommendation LBN32, together with the council’s land-use survey data of 2021/22 identifying the levels of existing provision in established and emerging centres.</p> <p>Policy HS2.4 (Managing new and existing Town and Local Centres) sets a threshold size for existing units in Commercial, Business and Service Uses (Class E) of at least 80sqm GIA floorspace, protecting them from subdivision or partial conversion that would result in un-functional units. This threshold is justified by the Retail and Leisure Study recommendations LBN35, as supported by recommendation LBN23. there is some flexibility to this threshold with criteria set for how an applicant may demonstrate that another size may be reasonable for retaining functionality of the units.</p> <p>Policy HS2.6 (Managing new and existing Town and Local Centres) sets a threshold for developments proposing a net total of 1000 sqm GIA or more in main town centre uses (major development) within town and local centres to submit a Vacancy Prevention Strategy and to provide 10% of floorspace as small units in Use Class E and at affordable rents – this threshold is justified by the case studies and recommendations set out in the Retail and Leisure Study Appendix 5 Meanwhile Use Topic Paper 2024 and Appendix 6 Affordable Retail Topic Paper 2024.</p> <p>Policy HS2.7 (Managing new and existing Town and Local Centres) sets a threshold for applicants proposing a net total of 2500 sqm or more GIA floorspace in any main town centre uses within town and local centres to submit an adequately resourced and evidenced Marketing Strategy – this threshold reflects the national retail/leisure impact assessment threshold, which is considered an appropriate scale at which developments that are in-centre should also demonstrate deliverability under complex market conditions, to ensure that town centres’ vitality and viability is</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>appropriately protected. The need for the threshold is justified by the Retail and Leisure Study (2022) recommendations LBN7, LNB9, and LBN32 which seek to protect the vitality and viability of town centres through robust testing of proposals in-centre, but where the national framework of an impact assessment is unsuitable.</p> <p>Policy HS2.8 (Managing new and existing Town and Local Centres) sets a threshold for major developments within town and local centres to incorporate drinking water fountains, toilets and baby changing/nursing facilities. See first paragraph of this section for explanation of this threshold.</p> <p>Policy HS3.2 – 3.4 (Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services) set a threshold of 300sqm GIA of retail (Ea) or restaurants and cafes (Eb) in Edge-of-Centre and Out-of-Centre Locations to submit a retail and/or leisure Impact Assessment – this threshold is justified by the Retail and Leisure Study (2022) recommendation LBN14 and follows the recommendations of the NPPF and London Plan for setting a locally-relevant impact assessment thresholds.</p> <p>Policies HS4.2 and HS4.3 (Markets and events/pop-up spaces) set a threshold for hot food pop-ups or market stalls in markets to operate no more than two days a week and no more than half of all stalls in a permanent market may operate as hot food stalls, or otherwise be subject to the impact assessment thresholds of HS6.1, The threshold is justified by the need for consistency with policy HS6 in managing health impacts, while recognising the different operating model of markets, and is considered a proportionate approach.</p> <p>Policy HS6.1a (Health and wellbeing on the High Street) sets a threshold of a separation distance of at least two units in other uses between any units in the specified use (hot food takeaways and gambling premises). This threshold is justified by the existing policy being carried forward, as supported by use-class survey GIS mapping of existing locations.</p> <p>Policy HS6.1b (Health and wellbeing on the High Street) sets a threshold of no more than three gambling premises within 400 metres of each other. This threshold is justified by the existing policy for betting shops being carried forward, as supported by use-class survey GIS mapping of existing locations.</p> <p>Policy HS6.1c (Health and wellbeing on the High Street) set thresholds of no hot food takeaways within 400 metres of the entrance points to any primary or secondary school, or no more than three hot food takeaways within 400 metres of each other. The first threshold is justified by consistency with London Plan Policy E9. The second threshold</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>is justified by the existing policy for hot food takeaways being carried forward, as supported by use-class survey GIS mapping of existing locations.</p> <p>Policy HS6.1d (Health and wellbeing on the High Street) sets a threshold of a 400 metres catchment drawn around a proposed specified use not overlapping with more than two other catchment areas drawn around existing or approved units in the same specified use/category. This threshold is justified by the existing policy for betting shops being carried forward, as supported by use-class survey GIS mapping of existing locations.</p> <p>Policy HS6.1e (Health and wellbeing on the High Street) sets a threshold that hot food takeaways should not account for more than 3 per cent of all units within any town centre and no more than 5 per cent of all units within any local centre. This threshold is justified by the Retail and Leisure Study (2022) recommendation LBN34, as supported by use-class survey GIS mapping of existing locations.</p> <p>Policy HS6.1f (Health and wellbeing on the High Street) sets a threshold that gambling premises should not account for more than 2 per cent of all units within any town or local centre. This threshold is justified by the Retail and Leisure Study (2022) recommendation LBN32, as supported by use-class survey GIS mapping of existing locations.</p> <p>Policy HS8.4 (Visitor accommodation) sets threshold for hotels providing ancillary leisure main town centre uses or recreation and sports facilities with accumulative floorspace more than 300 sqm GIA which are proposed to be made accessible to non-hotel visitors to submit a leisure Impact Assessment – this threshold is consistent with policy HS3 and the recommendations of the Retail and Leisure Study (2022).</p> <p>Policy SI2.2 (New and re-provided community facilities and health facilities) sets a threshold for new community or health facilities which are either, 1,000 sqm or greater GIA, have a user appeal beyond the local neighbourhood or are anticipated to generate a large number of trips, to meet the policy requirements which support such facilities where there are no unacceptable transport and highway impacts; and it can be demonstrated that the scheme has been designed to be neighbourly; and the proposed facility is located in a town or local centre; or if the facility is a main town centre use, it can be demonstrated through undertaking: a sequential test, that there are no suitable town centre or edge-of centre sites available, or expected to be available within a reasonable period; and if the facility is a main town centre use for a cultural use, a sport or recreation use, or a bar or pub above 300 sqm Gross Internal Area it can be demonstrated through undertaking an impact assessment, that there are no significant</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>adverse impacts on town centre vitality and viability and investment. The 300 sqm threshold reflects recommendations in the Retail and Leisure Study (2022).</p> <p>Policy SI2.3 (New and re-provided community facilities and health facilities) sets a threshold for new community or health facilities which are smaller than 1,000 sqm GIA and have a local neighbourhood user appeal located outside of town or local centre to meet the policy requirements which support such facilities outside of a town or local centre where the facility is easily accessible by walking, cycling and public transport methods for both staff and expected users of the facility; and there are no unacceptable transport and highways impacts; and it can be demonstrated that the scheme has been designed to be neighbourly; and it is located in a: Neighbourhood Parade; or next to a park or school; in an area of identified community facility deficit; or it can be demonstrated through undertaking a sequential test, that there are no suitable town centre or edge-of-centre sites available, or expected to be available within a reasonable period; and if the facility is a main town centre use for a cultural use, a sport or recreation use, or a bar or pub above 300 sqm Gross Internal Area, it can be demonstrated through undertaking an impact assessment, that there are no significant adverse impacts. As set out above, the 300 sqm threshold reflects recommendations in the Retail and Leisure Study (2022).The 1,000 sqm GIA threshold is justified and informed by the Transport for London Transport Assessment thresholds and London Plan Policy T4, Assessing and mitigating transport impacts.. At this scale of development, less than 1,000sqm, social infrastructure which is located outside of a town or local centre is less likely to have a detrimental impact on a neighbourhood.</p> <p>Policy J1.3 (Employment and growth) sets a threshold for all developments incorporating employment floorspace except those minor developments within designated employment locations, town centres and relevant site allocations identified for employment use to submit an Economic Strategy. This is justified by the potential impact of such developments on the local economy, particularly where proposals diverge from the spatial strategy for employment growth set out in the Local Plan.</p> <p>Policy J2.4 (New employment floorspace) sets a threshold for all office developments outside town centres and MBOAs of 300sqm GIA or more to provide an impact assessment – the 300 sqm threshold reflects recommendations in the Retail and Leisure Study (2022).</p> <p>Policy H3 (Affordable housing) sets thresholds for residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more to meet affordable housing requirements – this threshold is justified by the NPPF, which sets out that affordable housing should not be sought for non-major residential developments.</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>Policy H4 (Housing mix) sets thresholds for residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more to meet housing mix requirements – these thresholds are on the same as those set out for three bed housing in Newham’s adopted Local Plan, and are at a scale of development where it is more viable to deliver this housing mix.</p> <p>Policy H6 (Supported and specialist housing) sets a threshold for new specialist or supported housing for people with care needs, with the exception of sheltered housing for older people, to ensure residents from outside of Newham should not comprise more than 33 per cent of the total residents – this threshold is justified by the number of residents currently housed outside the borough given a lack of available Newham-based specialist housing, and is the same policy approach in the adopted Newham Local Plan (2018).</p> <p>Policy GWS3.2 (Biodiversity, urban greening, and access to nature) sets a threshold for major development and all development in close proximity to a Site of Importance for Nature Conservation or which is likely to have an impact on protected or a priority species or habitat to submit an ecological assessment – this threshold is consistent with London Plan Policy G6, as well as national policy and latest legislation and guidance.</p> <p>Policy GWS3.7 (Biodiversity, urban greening, and access to nature) sets threshold for development within 6.2km of the boundary of Epping Forest Special Area of Conservation (SAC) to mitigate any potential adverse ecological impacts. This threshold is justified by up to date evidence base, through Newham's Epping Forest Special Area of Conservation Recreation Mitigation Strategy (2025) and The Epping Forest Strategic Access Management and Monitoring Strategy (2022). The Council has a legal duty to ensure that planning application decisions comply with the Habitats and Conservation of Species Regulations 2017 (as amended) to protect the integrity of Epping Forest SAC.</p> <p>Policy CE2 (Zero Carbon development) sets a threshold for major developments to monitor their total energy use and renewable energy generation and submit the annual figures. This threshold is justified by the Climate Change Evidence Base (2022) Part 1 Operational energy & carbon.</p> <p>Policy CE3 (Embodied Carbon and the circular economy) sets a threshold for major developments to submit a Circular Economy Statement, Whole Life Carbon assessment and meet embodied carbon limits of less than 500kg</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>CO₂ /m² – this threshold is justified by the Climate Change Evidence Base (2022) Part 2 Embodied Carbon, following the embodied carbon limits set out in the London Plan.</p> <p>Policy CE6 (Air quality) sets a threshold for masterplans and development briefs for largescale development proposals subject to an Environmental Impact Assessment to consider how local air quality can be improved across the area of the proposal as part of an Air Quality Positive approach, as set out in the Air Quality Positive guidance.</p> <p>Policy CE7.2 (Managing flood risk) sets a threshold for developments within Flood Zones 2 (medium probability of flooding), and 3 (high probability), or within the tidal breach flood extent or where detailed more up to date modelling shows it will be at increased risk of flooding due to the impacts of the climate emergency to ensure the development design considers and incorporates a range of flood prevention requirements. This threshold was amended following comments by the Environment Agency and is in conformity with the national policy.</p> <p>Policy CE8.2 (Sustainable drainage) sets a threshold for major developments to maximise the multifunctional benefits of Sustainable Urban Drainage Systems and/or for site allocations within the N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North N4 Canning Town, N5 Custom House, N6 Manor Road and N17 Gallions Reach Neighbourhoods to implement blue-green infrastructure run-off reduction interventions or Sustainable Urban Drainage systems on 50 per cent or more of their site area. This threshold is justified by the requirement for Sustainable Urban Drainage solutions to be proportionate to the scale of development, as explained in the supporting text and major developments are large enough to be able to deliver a wide range of benefits through any SuDs. The neighbourhood specific requirement is from the Royal Docks and Beckton Opportunity Area Planning Framework.</p> <p>Policy CE8.4 and 8.5 (Sustainable drainage) sets a threshold for major developments and any new developments falling within a Critical Drainage Area to reduce surface water run-off to greenfield run-of rates through the application of Sustainable Urban Drainage Systems and other design considerations and submit a Surface Water Drainage Strategy – this threshold continues the approach in the adopted Local Plan.</p> <p>Policy T2.2 (Local transport) sets a threshold for major developments to provide or contribute to local transport improvements – this threshold is justified by the Sustainable Transport Strategy (2024), following the approach in the London Plan.</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>Policy T3.5 (Transport behaviour change) sets a threshold for major developments to make provisions for safe and convenient charging of E-bikes and mobility scooters – this threshold is justified by the Sustainable Transport Strategy (2024), following the approach in the London Plan.</p>
		<p>Policy W3.2 (Waste management in developments) sets a threshold for major residential development proposals to submit a Waste Management Plan – this threshold is justified, with the threshold the same requirement in the adopted Local Plan (2018).</p>
		<p>Policy W3.3 (Waste management in developments) sets a threshold for major residential developments on site allocations to provide a well-managed reuse and circular economy room – this threshold is justified based on the scale of development at which this provision can be masterplanned and appropriate management of these spaces can be proportionately delivered.</p>
		<p>Policy W3.6 (Waste management in developments) sets a threshold for major non-residential developments to provide waste management services as part of the service charges to businesses, with one contractor appointed for all business waste collections – this threshold is justified, being requested by the borough's Waste and Recycling team, with these developments being of a scale where impacts become more significant and where this requirement can be proportionately delivered.</p>
		<p>Policy W4.1 (Utilities and Digital) sets a threshold for major development to meet utilities and digital connectivity infrastructure requirements – this threshold is set out with consideration on the significance of additional demand such development places on existing infrastructure networks, and are designed to be proportionate to the scale and viability of the proposed development.</p> <p>Policy W4.4 (Utilities and Digital) sets a threshold for development within 800m of Beckton Sewage Treatment works to undertake an Odour Impact Assessment – this threshold follows comments by the Thames Water and follows the agent of change approach in the national policy and the London Plan.</p>
		<p>Implications of taking no further action: No further action required</p>
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>
		<p>Reviewer Comments:</p>

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The only document that policies defer strategic matters to is the emerging East London Joint Waste Plan. Policies in the Climate Emergency policies and Waste policies, refer to the Joint Waste Plan for additional requirements on circular economy and waste management. Newham is working in collaboration with the East London boroughs of Havering, Barking and Dagenham and Redbridge to develop an emerging Joint East London Waste Plan. The Plan is currently at Regulation 19 Consultation stage and once adopted, the Joint East London Waste Plan will set another long-term strategy and development management policies for delivering waste management target.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy? [For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Submission Local Plan promotes hierarchy in the policies below where they are used consistently and in conformity with national policy and the London Plan, where relevant: <u>Heritage</u> Policy D9 (Designated and non-designated heritage assets, ancient monuments and historic parks and gardens) sets out the hierarchy of heritage assets that then influences how these will be protected, conserved and enhanced:				

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> • designated heritage assets including buildings, monuments, structures, parks, etc., that are subject to national listing or scheduling; and • non-designated heritage assets including Locally Listed buildings and buildings/structures that are not yet on the local list but where development management processes uncover their heritage value. <p>This hierarchy reflects the NPPF and is applied across the Plan’s spatial strategy and other relevant parts of the Plan.</p> <p><u>Town centres</u></p> <p>Policy HS1 (Newham’s Town Centres Network) sets out a hierarchy for the Town Centre Network, which comprises of Metropolitan Centre, Major Centres, District Centres (in line with London Plan Policy SD8), smaller local centres and neighbourhood parades. It outlines the spatial strategy of directing main town centre uses to the borough’s network of Metropolitan, Major, District and Local Centres, proportionate to their scale in the hierarchy, and supporting the centres’ diversification and in some cases expansion through the ‘town centre first approach’. It also outlined requirements for protecting and expanding the borough’s network of Neighbourhood Parades to ensure the delivery of a network of well-connected neighbourhoods. This hierarchy is applied across the High Street policies, Inclusive Economy policies and Social Infrastructure policies in the Plan.</p> <p><u>Employment designations</u></p> <p>Policy J1 (Employment and growth) sets out a hierarchy for employment designations and non-designated sites, reflecting their role and importance in supporting the economic landscape in London and Newham. At the top of this hierarchy are Strategic Industrial Locations, which are critical to the economic function of London’s economy. Following are Local Industrial Locations (which is equivalent to the Locally Significant Industrial Locations in the London Plan) which play a vital role in supporting local economic growth. These locations accommodate a diverse range of industrial and storage, logistics and distribution and related uses, and should be protected and intensified to deliver further industrial floorspace. Land in these areas should not be released for other uses and nor is the or co-location with residential considered suitable. Next in the hierarchy are Local Mixed Use Areas, which support employment-led developments to deliver light industrial, small-scale office and workspace. In these areas, employment needs (including the viable operation of employment uses on the site and where relevant, adjacent sites) in any design must be prioritised. Only in some of the sites, other uses such as residential can be accommodated and should be secondary to the employment uses. Micro Business Opportunity Areas support low-cost workspace for smaller and start-up businesses. The policy also supports new workspaces in locations which complete a gap in the network of well-connected employment uses. The functional requirements and priority uses for designated sites are</p>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		<p>outlined in the policy. This hierarchy is applied across the Inclusive Economy policies and other relevant parts of the Plan.</p> <p><u>Sites of Importance for Nature Conservation</u> Policy GWS3 (Biodiversity, urban greening and access to nature) protects existing habitats and features of biodiversity value. Clause 6 seeks to avoid damage to Sites of Importance to Nature Conservation (SINCs). It sets out that Sites of Importance for Nature Conservation should be protected. Where harm to a Site of Importance for Nature Conservation, a protected or priority species or habitat, and where the benefits of the development clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts: a. avoid damaging the significant ecological features of the site, b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site c. deliver off-site compensation, in Newham, of better biodiversity value, d. where appropriate compensation is not possible, planning permission will be refused.</p> <p>This approach is justified by Newham's SINC Review (2025), the Green and Water Infrastructure Strategy (2025) the NPPF 2023 and the London Plan 2021 and is further explained in the implementation text GWS3.6.</p> <p><u>Social Infrastructure</u> Policy SI2 (New and re-provided community facilities and health facilities) sets out a hierarchy of where new social infrastructure would be considered acceptable, depending on its size. This approach is justified by the Community Facilities Needs Assessment and the London Plan, the town centre first approach of the NPPF for main town centre uses. It is further explained in the implementation text SI2.2, SI2.3, SI2.4 and SI2.6.</p> <p><u>Flood risk</u> Policy CE7 (Managing flood risk) uses flood zones to limit developments that are most at risk of flooding. This hierarchy is applied across the Climate Emergency policies and other relevant parts of the Plan that direct growth, particularly of vulnerable uses.</p>
		Implications of taking no further action: No further action required
		Mitigation / Action required (if necessary) to move scale to right: N/A
		Reviewer Comments:

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
36.	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>All policies in the Submission Local Plan that seek to limit certain uses are justified by evidence, and/or carried from the requirements in national policy, the London Plan or the adopted Local Plan. Justification for the requirements are clearly set out in the justification text as necessary or references are made to relevant supporting documents where the requirements are carried from. The policies that set limits for certain uses include the following and they are all positively prepared, justified and effective:</p> <ul style="list-style-type: none"> • Policy HS2 (Managing new and existing Town and Local Centres) restricts the loss of Use Class E within Primary Shopping Areas of town and local centres, which is informed by the Retail and Leisure Study 2022 recommendations and an assessment of the current (2022) concentrations achieved in centres. • Policy HS3 (Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services) restricts Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services uses, which is consistent with the NPPF and the London Plan and is justified by the Retail and Leisure Study 2022. For consistency, the approach is also set out in policy HS8.4 in relation to uses provided alongside a hotel/visitor accommodation. • Policy HS5 (Visitor Evening and Night Time Economy) restricts the opening hours of uses described in the implementation text Table 5 (Visitor-focused Evening and Night Time Economy uses) when they are located in Local Centres or Neighbourhood Parades, which is informed by the Retail and Leisure Study 2022 recommendations and an assessment of the current (2022) concentrations achieved in centres. • Policy HS6 (Health and wellbeing on the High Street) sets linear and area concentration limits for gambling premises and hot food takeaways in the borough which is informed by the Retail and Leisure Study 2022, the London Plan, and the existing established policies that are working effectively. 				

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> • Policy HS7 (Delivery-led businesses) directs dark kitchens, dark shops and micro-fulfilment centres (last mile distribution) to employment designations, in line with the approach set by policy J1 (see below) and also allows them to be delivered on site allocations which are expected to deliver employment uses, and in edge of centre or in-centre locations where certain design criteria are met. This approach recognises the different operational models of these businesses, loosening the approach in the adopted Local Plan, from just employment designations, while still seeking to limit their location to areas where their amenity and placemaking impacts can be mitigated. • Policy HS8 (Visitor accommodation) restricts visitor accommodation to town and local centres, in line with the town centre first approach of the NPPF for main town centre uses. The policy provides further flexibility for the area within 15-minute walk of the Excel Centre, recognising existing concentrations of visitor accommodation in out of centre locations in this area and in response to ongoing local economic demand. • Policy SI2 (New and re-provided community facilities and health facilities) restricts the location of social infrastructure depending on its size. This is set out in clauses 2 and 3. Clause 5 and 6 of the policy restricts size of re-provided social infrastructure depending on its location, taking into consideration impact on transport and highways and neighbourliness. This approach is justified by the Community Facilities Needs Assessment and the London Plan, the town centre first approach of the NPPF for main town centre uses. • Policy SI4 (Education and childcare facilities) directs new higher education facilities to Newham's designated town centres unless it can be demonstrated that development is required to improve and existing out of centre campus site. • Policy SI5 (Burial space and related facilities) protects the on-going use of existing in-use cemeteries and crematoria as spaces for burial against other uses. • Policy J1 (Employment and growth) restricts residential development in all Strategic Industrial Locations, Local Industrial Locations and some Local Mixed Use Area. This approach goes further than the London Plan position but is justified by local evidence, namely the Employment Land Review (ELR) (2022). The NPPF and the London Plan requires boroughs to assess their local need for employment land and make sufficient provision. The ELR indicates that the pipeline supply of industrial land is not sufficient to meet need. It also highlights Newham's important strategic role as a key industrial property market area and in close proximity

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>to the Central Activity Zone. As such, the Plan requires protection for industrial land and industrial development in both Strategic Industrial Locations and Local Industrial Locations and requires developments to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. A number of Local Mixed Used Areas are also identified in the Plan with no residential development permitted, in order to maintain its employment function as informed by the ELR.</p> <ul style="list-style-type: none"> • Policy H2 (Protecting and improving existing housing) seeks to protect residential housing from redevelopment, and includes additional restrictions around the loss of affordable housing, specialist and supported housing and family housing. The justification for this approach is evidenced by the borough's Strategic Housing Market Assessment (2022) and engagement with the borough's relevant commissioning services for specialist accommodation. • Policies H6 (Supported and specialist housing) and H7 (Specialist housing for older people) set out requirements for where specialist and supporting housing and housing for older people can be located. These are justified by both discussions with relevant Council commissioning services and the Strategic Housing Market Assessment (2022), and help to ensure accommodation meets local needs, is high quality and located in appropriate locations. • Policy H8 (Purpose-built student accommodation) seeks to limit purpose-built student accommodation where it is located in areas of over-concentration or outside well-connected town or local centre locations. The policy also contains requirements for applicants to secure bedrooms via nominations agreements and to provide ancillary spaces for study and exercise. These requirements are justified by the need ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, and does not undermine the delivery of the borough's and London's wider priority housing needs. It also seeks to ensure that social infrastructure in proximity of new student accommodation do not face undue pressures as a result of new student populations who require space to study and exercise. • Policy H9 (Houses in multiple occupation and large-scale purpose-built shared living) limits large houses in multiple occupation (sui generis) or large-scale purpose-built shared living developments to town and local centres or along major roads well connected by public transport (with a minimum Public Transport Accessibility Level of 4). This is justified by the need to ensure residents will have better access to services

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing.</p> <ul style="list-style-type: none"> • Policy H10 (Gypsy and Traveller accommodation) limits Gypsy and Traveller accommodation in Green Belt or Metropolitan Open Land and outside flood zone 1 in general circumstances. This is supported by the Strategic Flood Risk Assessment Level 1 and Level 2 (2023) and Sequential and Exception Tests (2024), and Strategic Newham Metropolitan Open Land Review (2024). It is also in accordance with the NPPF requirements for protecting the green belt, the London Plan requirements for Metropolitan Open Land (Policy G3) and the PPG Guidance on Flood risk and coastal change. • Policy GWS1 (Green spaces) protects existing green space. GWS1.1 seeks to ensure there is not net loss of green space, except where it meets the criteria in clause 3 of the policy. It seeks to maintain the open character of Metropolitan Land and Green Belt. The policy protects Green Belt or Metropolitan Open Land (MOL) against development except those either be capable of maintaining its openness or exceptionally, meet the very special circumstances test, is development which would enhance the quality and function of the MOL or Green Belt. This approach is justified by the Newham Metropolitan Open Land Review (2024) and is in accordance with the NPPF and the London Plan. GWS1.2 limits certain uses on playing pitches. This approach is justified by Newham's Playing Pitch Strategy (2025), Sport England's Playing Fields Policy and Guidance (2018), the Green and Water Infrastructure Strategy (2025) and is in accordance with the NPPF, the London Plan. GWS1.3 limits certain uses on green space (excluding Metropolitan Open Land and Green Belt). This approach is justified by the Green and Water Infrastructure Strategy (2025) and is in accordance with the London Plan and the NPPF. • Policy GWS2 (Water spaces) protects existing water space. Applications for water-related or water-dependant facilities will be supported in accordance with GWS2.3. The policy limits where such uses will be supported. This approach is justified by the Green and Water Infrastructure Strategy (2025) and the London Plan. Applications for residential and visitor mooring will be supported in accordance with GWS2.4. The policy limits where such uses will be supported. This approach is justified by the Green and Water Infrastructure Strategy (2025), Newham's Built Leisure Needs Assessment (2025) and the London Plan. • Policy GWS3 (Biodiversity, urban greening and access to nature) protects existing habitats and features of biodiversity value. GWS3.3 seeks to avoid damage to Sites of Importance to Nature Conservation (SINCs).

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>This approach is justified by Newham’s SINC Review (2025), the Green and Water Infrastructure Strategy (2025) the NPPF and the London Plan.</p> <ul style="list-style-type: none"> • Policy CE7.2 (Flood Risk) limits vulnerable uses in areas at risk of flooding which follows national policy requirements. This is also justified by the Strategic Flood Risk Assessment Level 1 and Level 2 (2023) and Sequential and Exception Tests (2024). • Policy CE8 (Sustainable drainage) sets out the presumption against impermeable hardstanding on domestic gardens and public open space, this is supported by the Newham Sustainable Drainage Design and Evaluation Guide (2020). • Policy T5 (London City Airport) includes existing restrictions on the airport (24-hour curfew from Saturday to Sunday lunchtimes and restrictions on night flights) contained within the extant planning approval for the airport. This is justified by the London City Airport Topic Paper (2025). • Policy W1 (Waste management capacity) safeguards existing waste sites within Newham. This is in accordance with the London Plan, and flexibility is incorporated in the supporting text to acknowledge the progress of the East London Joint Waste Plan. • Policy W2 (New or improved waste sites) sets out locational limits on where re-provided, new or intensified waste sites will be supported. This is justified by the need to ensure that waste sites are located in sustainable locations, both in terms of amenity impacts and proximity to the sources of waste. 				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
37.	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>Policy D1 (Design standards) proposes design standards which are informed by the National Design Guide, the National Model Design Code, a host of national standards as set out in the policy's evidence list, and more locally specific guidance recommended by the Characterisation Study (2024), with consideration of different types and scales of development. The implementation guidance provides clear criteria to support development management processes.</p> <p>Policy D2 (Public realm net gain) sets out the design standards for creating new, or enhancing existing, public realm. They are informed by a host of published best practice and design guidance as set out in the policy's implementation and evidence list, and by the locally-specific recommendations of the Characterisation Study (2024) which has considered different types and scales of development, and other design guidance as set out in the implementation texts. The implementation guidance provides clear criteria to support development management processes. Clause 5 requires new or retained public space in private ownership to demonstrate how the Public London Charter (2021) principles will be met and will allow for accreditation post-completion.</p> <p>Policy D3 (Design-led site capacity optimisation) sets out design standards for making efficient use of land, in line with the NPPF, the National Design Code support for compact development, the London Plan design-led approach, and the borough-specific assessment and recommendations of the Characterisation Study (2024). The implementation guidance provides clear criteria to support development management processes.</p> <p>Policy D4 (Tall buildings) sets out design standards in relations to location, maximum height and design of tall buildings. These parameters are informed by the Characterisation Study (2024) and the Tall Building Annex (2024) which define a height hierarchy and role of tall buildings across the borough. The tall buildings assessment fed into the site allocations capacity testing which provide the housing capacity figure that has informed the housing trajectory, this is set out within the Site Allocation and Housing Trajectory methodology note (2025).</p>				

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>Policy D5 (Shopfronts and advertising) sets out design standards for shopfronts, advertisements and hoardings. The policy builds on national standards for avoiding amenity impacts of advertising, the recommendations of the National Design Guide principles of providing active street frontages, Secured by Design principles of passive surveillance, as well as available good practice shopfront design guidance (e.g. Historic England's Streets for All). The implementation guidance provides clear criteria to support development management processes.</p> <p>Policy D6 (Neighbourliness) sets out the standards addressing amenity impacts from developments. They are informed by various best practice standards and technical guidance as set out in the implementation text.</p> <p>Policy HS2 (Managing new and existing Town and Local Centres) set out the requirements for protecting the functionality of smaller Use Class E units in line with recommendations of the Retail and Leisure Study (2022), and the requirement for delivering public realm improvements in town and local centres as recommended by the Retail and Leisure Study (2022) and the Characterisation Study (2024).</p> <p>Policy HS6.2 and 6.4 (Health and wellbeing on the High Street) set out the requirements for the food industry to meet healthy food standards in line with the London Plan.</p> <p>Policy HS7 (Delivery-led businesses) set out the requirements for delivering courier facilities, such as cycle parking, rest areas and toilets. The approach is justified by Newham's desire to promote an inclusive economy, recognising existing challenges for this sector of the local economy and particularly in relation to the late night (sometimes 24/7) nature of the work of couriers.</p> <p>Policy HS8 (Visitor accommodation) sets out the requirement for visitor accommodation to meet accessibility standards set by the London Plan.</p> <p>The Social Infrastructure policies set out requirements for community, health, educational and childcare facilities to meet design standards published by the Government.</p> <p>Policy SI5 (Burial space and related facilities) requires new burial space to provide a management plan which demonstrates how the applicable requirements of the Public London Charter (2021) principles will be met and secured.</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>Policy H11 (Housing design quality) sets out the housing design quality standards for new residential developments of various types, sizes and tenures. They are informed by the Housing Design Standards London Plan Guidance (June 2023) and other relevant London Plan Guidance documents, the Council's Housing Support Approved Accommodation Standards, the Characterisation Study (2024), advise of relevant commissioners and the Council's Occupational Therapist as well as other relevant best practice guidance. Guidance for implementation, to ensure the deliverability of the policy, is provided in the policy's implementation text.</p> <p>The Green and Water Space policies set out standards for the provision of green spaces as informed by the Green and Water Infrastructure Strategy (2025), the London Plan 2021 (notably Table 8.1) and standards published by Natural England, which sets out respective requirements for different scale, functionality and typology of green space. Policy GWS1 (Green spaces) requires new publicly accessible green space, not adopted by the Council, to demonstrate how the Public London Charter (2021) principles will be met and secured.</p> <p>Policy CE2 (Zero Carbon development) sets out standards for new development design and construction to reach the Net Zero Carbon target. These recommendations are in line with the recommendations of the Royal Institute of British Architects (RIBA), the Low Energy Transformation Initiative (LETI) and the UK Green Building Council. Various best practice standards and technical guidance that are relevant are set out in the implementation texts. The Climate Change Evidence Base sets out why Policy CE2 is necessary and the methodology behind them. Both the Climate Change Evidence Base and the viability assessment indicate how the policy is justified, achievable, deliverable and viable.</p> <p>Policy CE6 (Air quality) sets out requirements for development to meet national standards and the GLA guidance, which are set out in the implementation texts. This is justified by Newham's poor levels of air quality, as well as in the Air Quality Positive and Air Quality Neutral guidance.</p> <p>Policy T3 (Transport behaviour change) follows the car parking standard for employment and town centre uses, and cycle parking standards set by the London Plan. This is justified by the recommendations in the Sustainable Transport Strategy and the London Plan Policy T6.</p> <p>Policy W2 (New or improved waste sites) requires that developments that propose waste sites should include an appropriately detailed and resourced waste operator management plan. This is justified by the need to avoid</p>

	KEY QUESTIONS	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>amenity impacts associated with waste uses. Guidance for implementation, to ensure the deliverability of the policy, is provided in the policy's implementation text.</p> <p>Policy W3 (Waste management in developments) sets out quality standards for the design of waste and recycling stores in new development with the use of thresholds. They are informed by Newham's Waste Management Guidelines for Architects and Property Developers, Newham's Recycling and Waste Collection Policy and other best practice guidance, which provide further detail and will help to ensure the deliverability of this policy. Policy W3 also requires the delivery of automated waste vacuum collection systems on a small number of site allocations. This has been viability tested, and is considered to be justified and deliverable for the reasons set out in the Automated vacuum waste collection systems Topic Paper 2024.</p> <p>The Neighbourhood policies and site allocations are strategic policies that have been informed by the policies listed above which set out the standards and requirements for different land uses, design and infrastructure requirements, including transport social infrastructure and green space. The Neighbourhood policies and site allocations are to be read alongside the other policies in the Submission Local Plan.</p> <ul style="list-style-type: none"> • Neighbourhoods / site allocation - green and water spaces: Each site allocation sets out the amount of green, growing and play space required. The amount and type of green, growing and play space required has been informed and is justified by Newham's Green and Water Infrastructure Strategy (2025), Section 7 (part 1 and part 2). • Neighbourhoods / site allocation - social infrastructure: Each site allocation sets out, where required, the need for: <ul style="list-style-type: none"> ○ Community facility, this has been informed by the Community Facilities Needs Assessment (2022). ○ Education use, this has been informed by Newham's Pupil Place Planning Strategy (2024) and working in collaboration with Newham's Education Team. ○ Health facility, if required it includes the size needed. The Council has worked collaboratively with NHS partners throughout the Local Plan Review to plan for future healthcare needs, in line with the requirements of the London Plan and the NPPF. Information submitted by North East London ICB (formerly CCG) at each stage of the Local Plan consultation process has informed the development principles and infrastructure requirements in the site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note (2025).

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<ul style="list-style-type: none">Neighbourhoods/ site allocation – design: Each site allocation sets out the design requirements and height parameters which have been informed by informed by the Characterisation Study (2024) and the Tall Building Annex (2024). <p>The whole Plan is tested viable as supported by the viability assessment.</p>				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
	Deliverability					
38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Submission Local Plan has been subject to a whole plan viability assessment. The Plan is considered in general to be viable, with suggested mitigation incorporated into the policies as appropriate. The appraisal complies with the requirement as outlined in the National Planning Practice Guidance on Viability for a comprehensive assessment of all relevant plan policies in the viability assessment, including assessment of the main policies as well as their cumulative impact.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
	39.	Reviewer Comments:				
		-2	-1	0	+1	+2
	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	Reason for score: The Submission Local Plan reflects the conclusions and recommendations of the whole plan viability assessment. It concluded that the viability and delivery of development will not put at risk by the requirements in the local plan policies with suggested mitigation incorporated into the Plan as appropriate. Implications of taking no further action: No further action required Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
40.	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Monitoring Framework section of the Submission Local Plan clearly sets out the key performance indicators, target and scope of monitoring, local plan objectives monitored and the respective policies being monitored. All key performance indicators are measurable against their respective targets. These will be monitored by the Authority Monitoring Reports.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
41.	Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u> ? Where triggers for plan review and/or update are identified are they justified and proportionate?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Monitoring Framework section in the Submission Local Plan clearly outlines measurable key performance indicators and their respective targets set out for policies. The framework for plan review and monitoring has been included within Section 6 of the Local Development Scheme. The primary process of review will be through the assessment of the effectiveness of the policies through the Authority Monitoring Report, which justify whether a new Local Development Scheme is required.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
	Plan effectiveness (and associated policy clarity)					
42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years <u>from adoption</u> ? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Submission Local Plan clearly set out the timeframe that it covers in the introduction section. The Plan will be used to shape, plan and manage growth, regeneration and development across the borough to 2038. This is a 15-year period from the Regulation 18 Consultation and reflects the time period used within the evidence base. The Plan will be adopted with a shorter than 15 year time period and it is justified to reflect the likely need to undertake a further refresh at the 5 year review point to address the new plan making requirements and updates to the London Plan.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
43.	Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Paragraph i.5 of the Submission Local Plan clearly indicates which policies (all) of the adopted Local Plans (both Newham’s and the London Legacy Development Corporation’s) it supersedes.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	Reason for score: The Submission Local Plan clearly sets out the vision for how we will build a fairer Newham and a set of seven objectives the Council will need to achieve to deliver this vision: <ul style="list-style-type: none"> • 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 • People powered Newham and widening participation in the life of the borough and the work that the Council does These objectives inform spatial strategy and planning policies in the Plan. These will be used to assess planning applications and guide the Council's decisions on: <ul style="list-style-type: none"> • the location, amount and type of development to be delivered in the borough; • the standards that development should meet; • what it should look like; • what services and infrastructure are needed and where; and • how all residents will benefit from the proposed levels of growth and development. 				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
45.	<p>For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; <u>and</u> (ii) clearly defined on the Policies Map?</p> <p>Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Key Diagram in the Vision and Objectives section of the Submission Local Plan is a visual presentation of the overall Spatial Strategy. Where a policy includes designations related to particular locations in the borough, the boundaries are shown in the form of a map in relevant policies: <ul style="list-style-type: none"> • Policy D4 Map of Tall Building Zones • Policy D7 Map of Conservation Areas and Areas of Townscape Value • Policy HS1 Map of Town Centres Network • Policy J1 Map of Newham's Employment Designations <p>The Neighbourhoods section is also supported by neighbourhood maps and site allocation maps. All maps are placed in respective policy section/ neighbourhood/ site allocation and clearly referenced in the policy text as necessary.</p> <p>The Council also produced a pdf and an online GIS Policies Map, which includes all spatial designations identified in the policies. The online GIS map ensures that boundaries can be clearly seen. For the purposes of decision-making the GIS map shall be used instead of relying on the maps in the Plan, as it allows for zooming in the area and showing greater detail.</p>				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>The Submission Local Plan is organised into policy themes and has been thoughtfully structured to outline the requirement for different types of development under each theme. For example, housing developments are covered under 'Homes', employment uses are addressed under 'Inclusive Economy', and social infrastructure falls under 'Social Infrastructure'. Where a policy is related to a specific type of use, this is directly referenced within the relevant policy.</p> <p>Each site allocation specifies the required types of development and infrastructure in the development principles and infrastructure requirements sections.</p> <p>The Glossary section provides clear definitions of terms related to different developments which helps with understanding and implementation of the policies.</p> <p>The Plan uses positive language to enable development and growth in line with the Plan's vision and objectives.</p> <p>Implications of taking no further action: No further action required</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				
47.	<p>Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.</p> <p>[Note: If you have said 'all development' this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Submission Local Plan clearly outlines the different applications of policies based on scale, use and location, as detailed in the Spatial Strategy section. Some policies set specific thresholds (as discussed in the response to key question 33 above) or are targeted at particular types of development (e.g. supported and specialist housing) as appropriate. However, some policies apply to all developments, addressing requirements deemed critical for achieving the Plan's objectives, regardless of scale, use or location. This is clearly reflected in the policies themselves.</p> <p>Implications of taking no further action: No further action required</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments:</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
I	<p>State how many policies are in your local plan update?</p> <p>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</p>	<p>There are 63 policies within 10 topic chapters plus policies for 17 neighbourhoods and the 45 site allocations within them.</p> <p>Below are some policies that cross reference other policies within the plan or the London Plan in the policy text:</p> <ul style="list-style-type: none"> • D1.1e – Integrate natural features and ‘living-building elements’ throughout the built environment (in line with Local Plan Policy GWS3)..... • D2.2d – In areas of deficiency of access to children’s play space, major developments that generate an over-5s child yield at ten or above are strongly encouraged to deliver part of their formal playspace requirements within the public realm, and/or provide additional formal or informal playspace in the public realm that is over and above the floorspace requirements set out in Local Plan Policy H11 and/or the site allocation..... • D4.3a - address the criteria set by the London Plan Policy D9 section C; and..... • D4.3c – address London Plan Policy D9 section D when tall buildings fall within designated town centres and public viewing galleries at the higher levels might offer an opportunity for a view across the borough and London..... • HS2.5c – Mitigate amenity impacts resulting from the introduction of residential uses, in line with Agent of Change criteria of Local Plan Policy D6..... • SI1.1c – a Social Value and Health Impact Assessment (see Local Plan Policy BFN3) is provided and demonstrates potential gains are maximised and any negative impacts can be mitigated..... • J1.2e – The development of office floorspace (E(g)(i)) will be protected and supported within town centres as reflected in Table 10 and in accordance with Local Plan Policies HS1 and HS2..... <p>The Plan listed out the policies in the Local Plan and London Plan that are relevant in Policy Link under each policy.</p>				
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>The Submission Local Plan cross references policies in the main policy text only when necessary. To enhance understanding, some policies cross reference other policies in the implementation section, but again only if necessary. They are not repetitions.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: No further action required Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	Reason for score: The Submission Local Plan cross references regulatory requirements in the main policy text only if necessary. Building Regulations Approved Document M (for ‘accessible and adaptable dwellings’) is referenced in policies H11.7 and H11.8 (Housing design quality) to ensure the design quality for special needs housing meets the regulatory requirements. Building Regulations Part O, regarding regulating solar gain and heat removal from indoor environment, is referenced in Policy CE4.3 (Overheating) and is to be considered alongside with other standards in the Local Plan. It is considered necessary to have a policy on this, as a poor quality design may require active cooling to meet building regulations which would also hamper a development’s ability to meet Policy CE2 (Zero Carbon development) given the substantial amount of energy required to run a system. It is not considered that building regulations are sufficient to meet the Plan’s objectives. The regulations are not duplicated in the policies itself. Implications of taking no further action: No further action required Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base¹ (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker? [For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Ambiguity has been avoided in the Submission Local Plan. To allow flexibility, phrases like ‘in limited circumstances’, ‘as necessary’ and ‘as appropriate’ are primarily used in the implementation text to cover exceptional cases based on planning considerations, which enable further consideration during development management process with a case-by-case basis. This approach aims to achieve a better planning balance. Criteria for this assessment are then provided in the text. The Plan has been carefully drafted to ensure it is accessible and clear to both applicants and decision makers.				
		Implications of taking no further action: No further action required				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				