Homes Comments to the [full Regulation 19 Representations]

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-001	London Gypsies & Travellers		Reg19-E-001/003	Homes	H1 Meeting Housing Needs						No	No						Yes	3. Third concern: The omission of specific provisions for specialist housing adjusted for nomadic ways of life in "Our Newham Local Plan: HOMES", Policies H1 (Meeting housing needs), [H3 (Affordable housing) and H4 (Housing mix)]. This neglect in pitch and site provisions has forced Gypsies and Travellers, whose recognized ethnic identities are protected under the Race Equality Act, and whose protected characteristic is their culture and heritage of nomadism, to resign themselves to living in standard "brick and mortar" accommodation. Their protected characteristic was legally recognized in 2020 in the Court of Appeal judgment that the "Gypsy and Traveller community have an enshrined freedom not to stay in one place but to move from one place to another". According to the 2021 UK census, approximately 390 people identifying as Gypsy or Traveller were residents of Newham. Fewer than a fifth of Newham's Gypsies and Travellers lived on the designated site. The needs of the other four fifths, those who are living in standard "bricks and mortar" housing, are imperfectly known, due to the methodological limitations of ORS's Newham GTAA, with the exception of one Irish Traveller family who have been campaigning for culturally appropriate housing with adjustments for nomadism for years, to no avail. Nevertheless, all Gypsies and Travellers in Newham have the right to culturally appropriate housing, as a human right detailed in the UN Committee on Economic, Social and Cultural Rights, General Comment 4: The right to adequate housing (Article 11 (1) of the International Covenant on Economic Social and Cultural Rights), 13 December 1991, para 8(g); and also General Comment 21: Right of everyone to take part in cultural life (Article 15, para 1(a), of the International Covenant on Economic, Social and Cultural Rights), 21 December 2009, para 16(e), which are covered by Article 8 of the UK Human Rights Act. London Gypsies and Travellers recommends that the right to culturally appropriate adequate housing, including with adjustments for nomadism, is mainstreamed in all housing policies by explicit mention in Policies H1 (Meeting housing needs), [H3 (Affordable housing) and H4 (Housing mix)], because Gypsies and Travellers live in a variety of tenures and situations.	2) Under Policies H1 (Meeting housing needs), H3 (Affordable housing) and H4 (Housing mix), add the wording in bold to the existing wording in regular font: [at H1.1]: "Small sites will form a part of Newham's housing delivery. Developments should seek to optimise housing delivery on small sites below 0.25 hectares in size, following the design-led approach and using the small sites typologies set out in the Newham Characterisation Study (2024). Over the course of the Plan period, Newham will aim to deliver 3,800 homes on sites of this scale, **including culturally appropriate housing for Gypsies and Travellers with nomadic heritage,** as set out in Policies H2 and H14 of the London Plan 2021."	This wording change is not supported. We did not consider this change to be necessary as the policy is positively prepared, and would allow for the delivery of a range of housing tenures and typologies, including pitches to meet the needs of Newham's Gypsy and Traveller community. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-007	David Gilles		Reg19-E-007/018	Homes	H1 Meeting Housing Needs						Blank	Blank						Blank	P218 para 2 and footnote 19 [footnote 19 is at pg 206 of the designed draft plan]: This should be rewritten to state that our primary objective is to meet the housing needs of Newham Residents by providing them with decent homes (of both sorts) and that any surplus capacity over and above this can contribute to other London needs. Footnote 19 should be included in the revised justification. See para below.		Unfortunately it was not clear what comment you were making on this part of the Plan.
Reg19-E-007	David Gilles		Reg19-E-007/020	Homes	H1 Meeting Housing Needs						Blank	Blank						Blank	H1 3 P 220: Site allocations for general needs housing. This is either a statement of the obvious or it is unclear and it should either be deleted or rewritten.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy clause is effective. Policy H1.3 seeks to ensure that site allocations, which will deliver the majority of the borough's housing target, deliver general needs homes, which is the borough's highest housing need. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/021	Homes	H1 Meeting Housing Needs						Blank	Blank						Blank	H1 Justification P220: Net increase in housing 2023-2038. Same comment as P218 Para2 above. Clarify.		Unfortunately it was not clear what comment you were making on this part of the Plan.
Reg19-E-007	David Gilles		Reg19-E-007/022	Homes	H1 Meeting Housing Needs						Blank	Blank						Blank	H1.3 P222: Particularly important to insert "social and" before genuinely affordable in the penultimate sentence.		This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared because it is clear that affordable housing includes social rent housing. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/052	Homes	H1 Meeting Housing Needs						Blank	Blank						Blank	[Appendix 4 - email dated 8th September 2024] I have also raised again the issue of using HRH as the measurement of density rather that of units/ proportion of different bed size units' approach as set out in the R19D. Please can you provide an explanation as to why you favour this approach to measuring density. [Response by Jane Custance was attached as Appendix 5]		A change to this policy approach has not been made. We did not consider this change to be necessary as you achieve a greater proportion of family and affordable housing by using targets based on units rather than habitable rooms, thereby helping to ensure the policies are effective and positively prepared. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-011	Southern Housing		Reg19-E-011/005	Homes	H1 Meeting Housing Needs														[We also welcome …] and that the housing target has been increased (Policy H1). [It is also encouraging that these amendments have been made in response to comments received in response to the Regulation 18 consultation and that they are based on up to date evidence.]		Support noted. However this policy approach also received comments which raised concerns regarding Newham being unable to meet its 2021 London Plan target within the period of the London Plan. The Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716** Newham is unable to meet its 2021 housing target within the period of the London Plan. However, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing.

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Reg19-E-014	CPRE		Reg19-E-014/004	Homes	H1 Meeting Housing Needs														The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed: 1. Policy H1.1 All development should be on brownfield land. This policy should state unequivocally that all protected green space and amenity green space will be retained as such, and that building on green spaces will not be supported in any circumstances.		A change to this policy approach has not been made. We did not consider this change to be necessary as the approach to the protection, enhancement and delivery of new green space is justified by up to date evidence. The approach to green space has been informed by Newham's Green and Water Infrastructure Strategy. Policy GWS1 Green Space, seeks to deliver easy access to a network of high-quality green spaces. Clause 3 sets out the exceptional circumstances where development on green spaces will be supported. Development will only be considered acceptable if: a. it will not create or increase publicly accessible green space deficiency (at any scale); and b. replacement green space is provided in Newham, which provides equivalent or better functionality, quality and quantity in the existing well-connected neighbourhood or in an area of identified publicly accessible green space deficit; or c. it is communal amenity land on existing housing estates, where it can be demonstrated that the reconfiguration of the site would deliver both improved biodiversity and functional open space value for the residents; or d. the development will deliver local scale facilities which improve the usability and enjoyment of a green space or will provide new or enhanced outdoor recreational facilities, enabling alteration or replacement of existing buildings which are for green space dependant uses; and i. delivers a high standard of design which complements the character and appearance of the green space; and ii. improves the function of the green space while not having a negative impact on wildlife and biodiversity; and iii. is designed for people of all ages and physical abilities. In addition, the site allocations in the Local Plan specify where new green space is required to ensure we maintain 0.72 hectares per 1,000 residents of publicly accessible green space. This is considered to be proportionate and balanced approach. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-014	CPRE		Reg19-E-014/005	Neighbourhoods	H1 Meeting Housing Needs														[The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed: 1. Policy H1.1 All development should be on brownfield land.] All proposals / site allocations which propose building on green space should be deleted. A number of Site Allocations incorporate proposals to build on green space: these should be deleted and/or revised to state that all amenity green space will be retained due to the acute shortage in the borough. More generally, the plan should be revised to remove/edit any Site Allocations so no existing green space is lost.		A change to this policy approach has not been made. We did not consider this change to be necessary as the approach to the protection, enhancement and delivery of new green space is justified by up to date evidence. The approach to green space has been informed by Newham's Green and Water Infrastructure Strategy. Policy GWS1 Green Space, seeks to deliver easy access to a network of high-quality green spaces. Clause 3 sets out the exceptional circumstances where development on green spaces will be supported. Development will only be considered acceptable if: a. it will not create or increase publicly accessible green space deficiency (at any scale); and b. replacement green space is provided in Newham, which provides equivalent or better functionality, quality and quantity in the existing well-connected neighbourhood or in an area of identified publicly accessible green space deficit; or c. it is communal amenity land on existing housing estates, where it can be demonstrated that the reconfiguration of the site would deliver both improved biodiversity and functional open space value for the residents; or d. the development will deliver local scale facilities which improve the usability and enjoyment of a green space or will provide new or enhanced outdoor recreational facilities, enabling alteration or replacement of existing buildings which are for green space dependant uses; and i. delivers a high standard of design which complements the character and appearance of the green space; and ii. improves the function of the green space while not having a negative impact on wildlife and biodiversity; and iii. is designed for people of all ages and physical abilities. In addition, the site allocations in the Local Plan specify where new green space is required to ensure we maintain 0.72 hectares per 1,000 residents of publicly accessible green space. This is considered to be proportionate and balanced approach. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-014	CPRE		Reg19-E-014/011	Homes	H1 Meeting Housing Needs														[The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed:] 4. Housing estates, infill development and reconfiguring car-parking parking provision on estates: The Local Plan should include a policy for housing estate green spaces, stating that 'infill' schemes will ensure residents do not lose green space per person; building on estate green spaces will be resisted; if green space is lost it will be replaced and preferably enlarged; and that 'grey space' (parking / roads) on estates will be rationalised into specific locations allowing more to be converted to green space.		A change to this policy approach has not been made. We did not consider this change to be necessary as the approach to the protection, enhancement and delivery of new green space is justified by up to date evidence. The approach to green space has been informed by Newham's Green and Water Infrastructure Strategy. Policy GWS1 Green Space, seeks to deliver easy access to a network of high-quality green spaces. Clause 3 sets out the exceptional circumstances where development on green spaces will be supported. Development will only be considered acceptable if: a. it will not create or increase publicly accessible green space deficiency (at any scale); and b. replacement green space is provided in Newham, which provides equivalent or better functionality, quality and quantity in the existing well-connected neighbourhood or in an area of identified publicly accessible green space deficit; or c. it is communal amenity land on existing housing estates, where it can be demonstrated that the reconfiguration of the site would deliver both improved biodiversity and functional open space value for the residents; or d. the development will deliver local scale facilities which improve the usability and enjoyment of a green space or will provide new or enhanced outdoor recreational facilities, enabling alteration or replacement of existing buildings which are for green space dependant uses; and i. delivers a high standard of design which complements the character and appearance of the green space; and ii. improves the function of the green space while not having a negative impact on wildlife and biodiversity; and iii. is designed for people of all ages and physical abilities. In addition, the site allocations in the Local Plan specify where new green space is required to ensure we maintain 0.72 hectares per 1,000 residents of publicly accessible green space. This is considered to be proportionate and balanced approach. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-014	CPRE		Reg19-E-014/012	Homes	H1 Meeting Housing Needs														[The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed:] 5. Housing 'targets': There is a significant risk of over-allocation of land for new housing – land which could be used for other purposes. While we do not seek to challenge the figures for need, we must point out the implications of over-allocating land for housing which is very unlikely, in reality, to be built. Generally, the over-allocation of land means a great deal of land which could be allocated for other important purposes will lie idle for up to 20 years. Targets should be set at lower, realistic levels to ensure land is not wasted and potential for creating new sustainable transport hubs, large parks and green spaces is not lost.		A change to this policy approach has not been made. We did not consider this change to be appropriate as the plan is positively prepared, justified and effective. Newham has an important role to play in meeting both the borough's and London's wider housing need. If we didn't seek to optimise our future housing delivery to try to meet our London Plan housing target, there is a likelihood the Local Plan may not be found sound when submitted for examination. Other Local Plan policies (see Transport, Green and Water Spaces, and Neighbourhoods themes) seek to ensure we deliver sufficient new green spaces, open spaces and sustainable transport infrastructure to support new housing delivery in the borough. The 'Site Allocation and Housing Trajectory Methodology Note', which forms part of the Local Plan's evidence base also sets out which site allocations were considered suitable for different land uses, and the evidence base documents that were used to inform these decisions. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-015	Greater London Authority		Reg19-E-015/004	Homes	H1 Meeting Housing Needs														However, it is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan for two reasons: · firstly, the intention to alter the borough's housing targets prior to 2029 so that it is lower than the one established in the LP2021; and [· secondly the proposed approach to affordable housing.] Further detail on these is provided in the subsequent sections of this letter.		Comment noted. Our response to this issue is set out fully in response to the relevant representations below.

Reg19-E-015	Greater London Authority		Reg19-E-015/006	Homes	H1 Meeting Housing Needs			1										Housing LBN's housing target is set out in Table 4.1 of the LP2021 is for the delivery of 32,800 new homes between 2019 and 2029. In addition to that, LBN is also absorbing the LLDC housing target component in their area. Combined, this means that LBN's housing target is 47,600 new homes for that period, which equates to an average of 4,760 a year. For LBN's entire Plan period, 2023-2038, it is the intention to deliver up to 53,784 new homes. LBN's combined LP2021 housing target for the period 2023-2029, taking account of the shortfall in delivery prior to the start of the Plan (2019-2023) is for the delivery of just under 36,000 homes. Once that target has been met the remaining target would be to deliver almost 18,000 new homes up to 2038 which represents half of the current annual target. The proposed drop in housing target is considered significant. LBN's evidence in the Site Allocations and Housing Trajectory Methodology 2024 [Footnote 1 - https://www.newham.gov.uk/downloads/file/7707/site-allocation-and-housing-trajectory-methodology-july-2024] anticipates lower than expected delivery against the LP2021 housing target which would amount to shortfall of 16,472 homes by 2029. In these situations, the Mayor considers that LBN should demonstrate that they have exhausted all suitable options for meeting the housing target by 2028/29. Where it has been clearly demonstrated that the 10-year target will not be met by 2028/29, boroughs should add the shortfall to the target identified beyond 2028/29 and LBN should clearly demonstrate how that shortfall can be delivered in the first few years after 2028/29. LBN's evidence indicates that the shortfall of delivery stems from delays to the delivery of allocated sites within the adopted Local Plan and that LBN can make up the shortfall relatively quickly by 2033/34. Instead of following the approach set out above, the intention is to lower the borough's housing target in a stepped manner as outlined below - resulting in a target which is lower than the one currently in the LP2021 for the period to 2029 (of 4,760 homes per year up to 2029). · 2023 – 2028 - 2,974 new homes · 2028 – 2033 – 3,836 new homes · 2033 – 2038 – 3,475 new homes LBN should take into consideration that paragraph 0.0.21 of the LP2021 is clear that "The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures…"		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target related to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

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Reg19-E-015	Greater London Authority		Reg19-E-015/007	Homes	H1 Meeting Housing Needs														Furthermore, it is important to note that the LP2021 does not meet London's identified housing need and therefore the overall amount of housing required annually should not be expected to reduce beyond 2029. It is also noted that proposed changes to national policy are likely to mean a significant increase in London's overall housing need figure - the Mayor is in the process of preparing a new Strategic Housing and Land Availability Assessment (SHLAA) and London Plan which will apportion targets across boroughs. Recognition of this context (of increased need) would be a useful consideration when planning for housing beyond 2029. LBN should also be aware that the recently published national draft Local Housing Need figures will not form borough new housing targets which will be different. Notwithstanding the fact that the shortfall is added to LBN's target post 2029, which is accepted in principle, the Mayor has concerns that the net target post 2029 is significantly lower at 1,980 per annum, once the shortfall is removed. In addition, the Mayor considers that the intention to lower the borough's housing target prior to 2029 to below the one set out in the LP2021 is not in general conformity with the LP2021. A failure to deliver against the LP2021 housing target compromises the implementation of the LP2021 as a whole.		A change to this policy approach has not been made. We did not consider this change to be necessary as once we have met the London Plan housing target, capacity is based upon the capacity identified in the 2017 SHLAA, any additional capacity delivered as a result of any committed transport infrastructure improvements (in Newham's case informed by the largest site allocations which will continue to deliver units in the long term phase of the plan), and the rolling forward of the housing capacity assumptions applied in the London Plan for small sites. The approach is therefore in conformity with the requirements of paragraph 4.1.11 of the London Plan. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-015	Greater London Authority		Reg19-E-015/008	Homes	H1 Meeting Housing Needs														LBN should explore all the mechanisms at their disposal to facilitate all sources of housing supply including from small housing site development. LBN's small sites housing target is set out in Table 4.2 of the LP2021 to deliver 380 new homes a year. However, between 2019 and 2023 LBN's small sites delivery has averaged 284 new homes a year, which is lower than the target. LBN is advised to follow the guidance set out in Policy H2B by preparing site-specific briefs, masterplans and housing design codes for small sites. The Mayor has also published his Small Sites Design Codes LPG [Footnote 2 - https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/small-site-design-codes-lpg]. Small sites should be considered as a valuable source of housing delivery and should be capitalised to contribute towards meeting the boroughs housing target.		A change to this policy approach has not been made. We did not consider this change to be necessary as Newham have published a Small Sites Intensification Guidance 2024. This guidance will support the future optimisation of capacity on small sites, to ensure we meet the GLA's small sites target for Newham. The policy approach is therefore positively prepared and will be effective in development management decision-making on small sites. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-024	Home Builders Federation		Reg19-E-024/020	Homes	H1 Meeting Housing Needs			1				No							H1: Meeting housing needs Part 1 and the housing requirement figure for the plan period is unsound because it needs a bit more explanation. However, on the basis of the figures provided, it is uncertain that the Local Plan deliver the housing requirement specified by the London Plan and it is not positively prepared. Paragraph 3.169 and footnote 19 explain that the housing requirement for Newham for the period 2019/20 to 2028/29 (the London Plan period where housing land supply is more certain) is made up of 32,800 homes per year in Newham and 14,800 homes per year as Newham;' share of the area administered by the London Legacy Development Corporation (LLDC). The powers of the LLDC are gradually being transferred to Newham. This equates to 47,600 net additional homes. This is the figure stated in paragraph 3.169. HBF agrees with this, and this is the requirement that the Council must endeavour to deliver by 2028/29 in accordance with the London Plan. It would be unsound not to.		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target related to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above~~.~~, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

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Reg19-E-024	Home Builders Federation		Reg19-E-024/021	Homes	H1 Meeting Housing Needs			1				No							The Council states in Policy H1, Part 1, that the Local Plan will operate between 2023 and 2038. It states the requirement for this period is between 51,425 and 53,784 dwellings. First, the Council needs to explain how many net additional homes have been delivered since the first year of the London Plan – 2019/20 – and the residual requirement for the rest of the period up to 2028/29.		A change to this policy approach has not been made. We did not consider this change to be necessary as this is set out within the Housing Trajectory Methodology Note. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-024	Home Builders Federation		Reg19-E-024/022	Homes	H1 Meeting Housing Needs			1				No							Second, the Council will need to explain the calculation and the figures used for the requirement for the years from 2029/30 that post-date the last year of the London Plan (where the housing land supply is more certain – in effect a ten-year plan). This is necessary to understand how many homes Newham is required to deliver to support the London Plan.		A change to this policy approach has not been made. We did not consider this change to be necessary as this is set out within the Housing Trajectory Methodology Note. The housing target is based on available capacity in the phases of the plan period. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-024	Home Builders Federation		Reg19-E-024/023	Homes	H1 Meeting Housing Needs			1				No						Completions measured against the start of the London Plan 32,800 homes, in total, are required over the ten years of the London Plan in Newham. The GLA's Residential Completions Dashboard (https://data.london.gov.uk/dataset/residential-completions-dashboard) records the following for Newham and LLDC since 2019/20: Newham [Image of completions dashboard] This indicates a total of 9,812 dwellings completed for Newham since 2019/20. LLDC [Image of completions dashboard] This indicates a total of 6,373 dwellings in LLDC although we do not know how many completions can be attributed to the part of Newham that falls within the control of LLDC. This should be clarified. In total this gives completions of 16,185 since 2019/20 although it is possible that not all of those registered for LLDC can be attributed to Newham. We will ignore the portion from the LLDC for Newham for the moment, to keep the calculation simple, but these figures may be added in by the Council. The requirement based on the London Plan for Newham is 3,280 per year, or 32,800 in total. For the six years from 2019/20 to 2024/25 9,812 dwellings have been completed, leaving a deficit of 22,988 dwellings to be provided until the end of the London Plan in 2028/29. As there are four years remaining until the end of the London Plan that would mean a residual housing requirement of 5,747 dwellings per year. <u>Phased delivery</u> Paragraph 3.174 states that supply will be via a stepped trajectory, with a different target for every five-year phase. The table is reproduced below: [Image inserted on Stepped trajectory table] In the first phase, 14,870 dwellings would be provided. For one year – 2028/29 – it is proposed that another 3,836 homes will be provided. This would provide a total of 18,706 dwellings up to the end of the London Plan. This falls short of the residual requirement for Newham of 22,988. To this would need to be added the apportionment for LLDC (required number versus completions). Consequently, we cannot conclude at this time that the draft Local Plan is sound in terms of supporting the London Plan and delivering the required number of homes by 2028/29. Certainly, the phasing would provide too few homes to support the London Plan. The annual average figure for		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target related to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

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																			the first phase is fewer than the annual average in the London Plan. Nor does this account for the backlog, and nor does this account for the application of a buffer, if one is needed, which we assume it does based on the HDT results for 2022. Certainly, we are opposed to the use of a stepped trajectory to circumvent the need to deliver what is required by the London Plan by 2028/29.		

Reg19-E-024	Home Builders Federation		Reg19-E-024/024	Homes	H1 Meeting Housing Needs			1				No							Housing requirement post 2028/29 The Council has explained in paragraph 3.174 that it follows the advice in the London Plan for setting a housing requirement after 2028/29 which involves 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. The Council needs to specify what these figures are and what this means in terms of an annual average housing requirement. This clarity is necessary for the purposes of assessing the five-year housing land supply and measuring delivery. Crudely, if the overall requirement for the period 2023 to 2038 – i.e. 15 years - is for a minimum of 51,425 dwellings, then the annual average requirement would be 3,428 dwellings per year (or 3,586 if it is 53,784). However, we would not support this approach, as the Council will need to deliver the London Plan requirement in full by 2028/29 including any deficit accrued since 2019/20. It will need to ensure its policies are conducive to this.	Consequently, we would advise that the Council sets out a separately a specific requirement for the period 2029/30 to 2037/38 based on the capacity it has identified.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target related to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. Once we have met the London Plan housing target, capacity is based upon the capacity identified in the 2017 SHLAA, any additional capacity delivered as a result of any committed transport infrastructure improvements (in Newham's case informed by the largest site allocations which will continue to deliver units in the long term phase of the plan), and the rolling forward of the housing capacity assumptions applied in the London Plan for small sites. The approach is therefore in conformity with the requirements of paragraph 4.1.11 of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new

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																					homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**
Reg19-E-024	Home Builders Federation		Reg19-E-024/025	Homes	H1 Meeting Housing Needs			1				No							A new London Plan This capacity derived figure can only be regarded as a provisional figure because a) it is not based on an assessment of need, as advised by national policy; and b) because it is likely that a new London Plan will be adopted by circa 2027, which will establish new housing requirements for each of the London boroughs, based on an updated assessment of need (that may, or may not, reflect new national policy)	The draft Local Plan, consequently, will need to be amended to make this clear.	A change to this policy approach has not been made. We did not consider this change to be necessary as the London Plan target is formulated based on a distribution of London's need to available land across greater London. The Local Plan will be examined against the adopted London Plan, and therefore plans to meet the 2021 London Plan housing target. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/031	Homes	H1 Meeting Housing Needs														Beckton Developments supports the principles of draft Policy H1 which seeks to deliver a net increase of residential units. However, the policy sets a net increase of between 51,425 and 53,784 residential units between 2023 and 2028, this is contrary to the Standard Methodology Housing Need (published in June 2022 by ORS) which outlines a housing need in Newham of 4,760 new homes per annum. This equate to the delivery of 71,400 units over the Local Plan period. It is widely reported and evidenced that the UK is experiencing a 'housing crisis', particularly in London and the South East. There is a distinct imbalance between the demand and supply of homes/the magnitude of the crisis and the direct burdens it is placing on both local authorities and residents. Under-delivery is marked in Newham which only provided 84% of the Housing Delivery Test (2022) target for new homes in the Borough, a target itself set at a level markedly below need. In order to be found sound, any planning strategy for the Borough must demonstrably optimise housing delivery in order to ensure that the greatest contribution can be made to housing delivery from every well located and highly accessible brownfield sites, both for the Borough and London as a whole. As drafted, the emerging Plan has the potential to limit delivery of much-needed housing in the Borough, by placing unsubstantiated capacity constraints on proposed developments.		The comment you have provided has not resulted in a change. To clarify, regional policy is clear that Newham's current housing target it set by the 2021 London Plan, which requires Newham to deliver 4,670 homes per annum. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery being both justified and effective, being based on realistic evidence of delivery. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/004	General	H1 Meeting Housing Needs														In summary, LBN currently: • Has a five-year land supply of 2.14 years against the London Plan Targets • Does not have sufficient identified housing capacity. • Does not have the level of identified deliverable sites to meet future expected demand. • Has an open space deficiency across the Borough. 1.5 On this basis it is essential that the R19		The comment you have provided has not resulted in a change. Newham's current housing target it set by the 2021 London Plan, which requires Newham to deliver 4,670 homes per annum. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-

																					plan is positively prepared in providing for enough housing provision and public open space over the plan period as informed by the London Plan 2021, and on a sufficient number of identified sites.		to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery being both justified and effective, being based on realistic evidence of delivery. With regards to open space, the approach to the protection, enhancement and delivery of new green space in the plan is justified by up to date evidence. The approach to green space has been informed by Newham's Green and Water Infrastructure Strategy. Policy GWS1 Green Space, seeks to deliver easy access to a network of high-quality green spaces. Clause 3 sets out the exceptional circumstances where development on green spaces will be supported. In addition, the site allocations in the Local Plan specify where new green space is required to ensure we maintain 0.72 hectares per 1,000 residents of publicly accessible green space. This is considered to be proportionate and balanced approach. The Council is satisfied that the plan is sound without the proposed changes. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/007	Homes	H1 Meeting Housing Needs														Savills, on behalf of Aston Mansfield, has objections to the plan as currently prepared, which fails to provide enough clarity as to how the required level of housing will be provided across the identified Site allocations. Savills support the increased housing target of between 51,425 and 53,784 homes between 2023 and 2038 but note the text within the main changes' summary document, which details that the target is unachievable. “We have increased our housing target, indicating that we are now planning to deliver between 51,425 and 53,784 homes between 2023 and 2038. This change has been made to reflect emerging evidence, including revised design-led capacity testing of site allocations and projected housing delivery on small sites in the borough. Developers and the GLA also raised concerns regarding Newham not being able to meet our 2021 London Plan housing target. We considered this change was necessary in order to help meet the borough’s housing target in the London Plan. While we are still unable to meet our London Plan housing target, largely due to delays in site delivery, we have sought to optimise housing delivery in line with the London Plan’s design-led approach and the Local Plan objective to create successful sustainable mixed-use places" LBN therefore acknowledge within the Site Allocation and Housing Trajectory Methodology Note (December 2024) that they are unable to demonstrate a 5-year housing land supply when measured against the adopted London Plan housing target. Indeed, LBN recognise that there is currently a five-year land supply of only 2.14 years against the London Plan (2021)It is essential that the LBN plans responsibly to ensure it has the land to deliver the required level of future expected growth and to accommodate the housing needs of existing and future residents and to also harness the associated economic development which comes with it.		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above , the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

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Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/046	Homes	H1 Meeting Housing Needs			1											Support: Increased housing target from between 46,633 and 52,133 homes between 2021 and 2038.(equating to between 2,743 and 3,066 homes per year) to between 51,425 and 53,784 homes between 2023 and 2038 (equating to between 3428 and 3585 homes per year).		Support noted. However this policy approach also received comments which raised concerns regarding Newham being unable to meet its 2021 London Plan target within the period of the London Plan. The Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716** Newham is unable to meet its 2021 housing target within the period of the London Plan. However, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/047a	Homes	H1 Meeting Housing Needs			H1.1											Comment: The R19 plan details that Newham will aim to deliver 3,800 homes on small sites below 0.25 hectares, this is as per the R18 plan and based upon the London Plan minimum target (table 4.2). We would expect a higher target upon small sites to reflect the higher overall housing aims.		A change to this policy approach has not been made. We did not consider this change to be necessary as this approach to small sites is in conformity with the requirements of the London Plan Policy H2. Our approach to small sites is set out in more detail in the Site Allocation and Housing Trajectory Methodology. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/047b	Homes	H1 Meeting Housing Needs			H1.1											No detail is provided within the R19 plan as to the capacity of individual site allocations, or the total level of housing that would be expected to be delivered as a site allocation or upon Windfall sites.		A change to this policy approach has not been made. We did not consider this change to be necessary as the approach is justified. The site allocations and policies include design principles for how sites should be optimised for housing as well as requirements for different types of use. The London Plan Policy H1 does not require boroughs to publish the capacity figures associated with individual sites so the Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/047b	Homes	H1 Meeting Housing Needs			H1.1											Housing numbers remain heavily reliant on the availability and deliverability of large strategic sites, which are notoriously difficult in terms of land assembly and thus their immediate availability and deliverability within the plan period. The higher housing target outlined within the R19 plan is unlikely to be met without additional housing site allocations including the strategic release of MOL land.		A change to this policy approach has not been made. We did not consider this change to be necessary as the designation of this site as Metropolitan Open Land is justified in Newham's updated Metropolitan Open Land Review (2025). In addition, Newham's Site Allocation and Housing Trajectory Methodology Note (2024) has identified sufficient capacity for housing without the need to undertake a review of open space designations. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/020	Homes	H1 Meeting Housing Needs						Blank	No						Blank	Stratford Cross is a mixed-use district comprising commercial offices, leisure, retail and residential plots in a highly accessible location with a PTAL of 6b. Consequently, we support optimising the residential capacity on highly accessible sites, such as Stratford Cross and considers that this approach should be carried through other policies relating to Housing Mix (Policy H4), affordable housing (Policy H3) [and Tall Buildings (Policy D4)]. Whilst the housing target has increased in the Draft Submission Local Plan, the Regulation 18 Report explains this still falls short of the 2021 London Plan housing targets agreed with the GLA for Newham, including a relevant proportion of the LLDC area. As drafted, the plan is unsound with the London Plan and policies should be supporting increased housing delivery in the borough particularly with greater need for housing set out by the Government in the 2024 National Planning Policy Framework (NPPF) consultation. To meet the housing targets and assessed demand, the Local Plan policies should be less restrictive.	[This should include allowing buildings to exceed 100m in height where the design quality can be demonstrated, particularly where there are existing buildings or consents exceeding 100m in the area.]	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34. We therefore do not consider our housing mix policies undermine our housing capacity. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above , the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/021	Design	H1 Meeting Housing Needs						Blank	No						Blank	Stratford Cross is a mixed-use district comprising commercial offices, leisure, retail and residential plots in a highly accessible location with a PTAL of 6b. Consequently, we support optimising the residential capacity on highly accessible sites, such as Stratford Cross and considers that this approach should be carried through other policies relating to [Housing Mix (Policy H4), affordable housing (Policy H3) and] Tall Buildings (Policy D4). Whilst the housing target has increased in the Draft Submission Local Plan, the Regulation 18 Report explains this still falls short of the 2021 London Plan housing targets agreed with the GLA for Newham, including a relevant proportion of the LLDC area. As drafted, the plan is unsound with the London Plan and policies should be supporting increased housing delivery in the borough particularly with greater need for housing set out by the Government in the 2024 National Planning Policy Framework (NPPF) consultation. To meet the housing targets and assessed demand, the Local Plan policies should be less restrictive.	This should include allowing buildings to exceed 100m in height where the design quality can be demonstrated, particularly where there are existing buildings or consents exceeding 100m in the area.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above , the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/022	Homes	H1 Meeting Housing Needs						Blank	No						Blank	Housing policies (H3 and H4) should also be less prescriptive and allow sites to be optimised in accessible locations to meet demand. Therefore, flexibility should be introduced to these policies to support optimising housing delivery to meet housing targets on highly accessible sites and to be consistent with draft Local Plan Policy D3 (Design-led site capacity optimisation) and London Plan Policy D3 (Policy D3 Optimising site capacity through the design-led approach).		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34. We therefore do not consider our housing mix policies undermine our housing capacity. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above , the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/016	Homes	H1 Meeting Housing Needs						Blank	No						Blank	[Appendix 2 - Representations Part 1] The housing target of a net increase of between 51,425 and 53,784 units has increased from the first consultation of the draft Local Plan but it is still short of the London Plan housing targets agreed with the GLA for Newham, including a relevant proportion of the LLDC area (as set out in the Regulation 18 Report). The policy as currently worded is therefore unsound as it is not compatible with the London Plan. This is also at odds with the 2024 National Planning Policy Framework (NPPF) consultation which seeks to increase housing delivery.		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above , the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/009a	Homes	H1 Meeting Housing Needs						Yes	No						Yes	Draft Policy H1 (Meeting housing needs) continues to state that the majority of LBN's new housing will be delivered on allocated sites and that housing delivery will be optimised on sites below 0.25ha. It is noted that the minimum target for new residential units in the borough, identified within this draft policy, has increased by 4,729 new units from the Regulation 18 draft plan (indicating that it is now planning to deliver 51,425–53,784 homes over the plan period), which is welcomed It is therefore clear from revised draft Policy H1 that sites such as the Site are required to contribute towards the delivery of new residential uses to meet LBN's housing needs and achieve its increased targets.	We support the updated draft Policy H1 and given the expectation of the policy, as well as the Newham Characterisation Study (2024) in relation to Plaistow North, we urge LBN to make it clearer that residential uses are required on designation LMUA6: Ashburton Terrace to ensure Policy H1 is deliverable and LBN is able to meet its housing needs. The proposed change will ensure draft Policy J1 is positively prepared.	A change to this policy approach has not been made. We did not consider this change to be necessary as the wording of policy J1 is positively prepared and effective and would not preclude the delivery of residential uses on Local Mixed Use Areas, subject to schemes meeting the relevant policy requirements of the plan. In particular, the Employment Land Review sets out that this site should come forward for employment-led development, where development is required to first meet employment needs in any design, and then other uses such as residential can be fitted around it. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/009b	Homes	H1 Meeting Housing Needs						Yes	No						Yes	Draft Policy H1 (Meeting housing needs) continues to state that the majority of LBN's new housing will be delivered on allocated sites and that housing delivery will be optimised on sites below 0.25ha. It is noted that the minimum target for new residential units in the borough, identified within this draft policy, has increased by 4,729 new units from the Regulation 18 draft plan (indicating that it is now planning to deliver 51,425–53,784 homes over the plan period), which is welcomed It is therefore clear from revised draft Policy H1 that sites such as the Site are required to contribute towards the delivery of new residential uses to meet LBN's housing needs and achieve its increased targets.	[We support the updated draft Policy H1 and given the expectation of the policy, as well as the Newham Characterisation Study (2024) in relation to Plaistow North, we urge LBN to make it clearer that residential uses are required on designation LMUA6: Ashburton Terrace to ensure Policy H1 is deliverable and LBN is able to meet its housing needs. The proposed change will ensure draft Policy J1 is positively prepared.] As noted above, it is also important to identify that residential uses comprise of a range of residential products including Large-Scale Purpose-Built Shared Living (LSPBSL or 'Co-Living') developments. The GLA's LSPBSL LPG (adopted in February 2024) identifies that co-living contributes an element of housing choice and is counted towards housing supply (at a ratio of 1:8:1 basis). This should be recognised within LBNs new local plan to allow quasi-residential uses (not just C3 housing) to come forward on appropriate sites.	A change to this policy approach has not been made. We did not consider this change to be necessary as the wording of policy J1 is positively prepared and effective and would not preclude the delivery of residential uses on Local Mixed Use Areas, subject to schemes meeting the relevant policy requirements of the plan. In particular, the Employment Land Review sets out that this site should come forward for employment-led development, where development is required to first meet employment needs in any design, and then other uses such as residential can be fitted around it. The wording of the allocation would not preclude housing other than general needs housing being delivered; however, the acceptability of these types of housing on site allocations will be dependent on whether they meet the policy requirements set out in the relevant Local Plan policies. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/007	Homes	H1 Meeting Housing Needs						Blank	Blank					Blank	Background – Wider Needs Context No one disputes the fact that we have a housing crisis in London and Berkeley Homes supports the Borough's desire to address housing needs. However, in its current format, the DSLP is overly restrictive around a number of housing typologies and thus does not adequately address the pressures within the housing market as a whole. The current housing crisis is a national issue, but one felt most acutely across the Capital. National demand for homes is thought to be close to 4.3 million homes, which would take half a century to rectify should the current annual target of 300,000 homes per annum from the Government be met*(1)*. There has been persistent underdelivery in recent years. From a policy perspective, the NPPF (December 2023) notes at Paragraph 60 the objective of "significantly boosting the supply of homes". The London Plan recognises the scale of the problem to be solved, noting in the Mayor's foreword that there are "no quick fixes to the housing crisis London faces". Following the issue of the draft NPPF in July 2024, the urgent need for housing delivery has been confirmed by the new Labour government. The draft NPPF makes clear that unlocking economic growth is linked to addressing the chronic under delivery of housing. A brownfield-first approach has been strengthened through the broadening of the definition and that substantial weight should be applied to ensure favourable decision making on brownfield land. In 2019-20, 248,591 net dwellings were built in England falling to 217,754 in 2020-21 and for the subsequent two years the number of new homes has not exceeded 235,000. This represents a shortfall of more than 263,655 homes during that four-year period. The downward trend in housebuilding is expected to continue. Private home starts are forecasted to drop by 25% this year, and completions by 19%*(2)*. Housing Delivery Test results show that only four Local Planning Authorities in London met their house building targets in 2022/2023. In response to this, in December 2023, Michael Gove commissioned a review of the Mayor of London's 'London Plan (2021)'. The review was undertaken by a panel of expert advisers, led by Christopher Katkowski KC. The purpose of the review was to consider whether there were specific changes that could be made to policies within the London Plan to facilitate increased delivery of new homes on Brownfield sites across the capital. Following the review, the 'London Plan Review - Report Of Expert Advisers' was published in February 2024, which talks about the key findings and recommendations which might facilitate housing delivery on brownfield sites in London. The report set out that there is no dispute around the status of the housing crisis in London, and the supply of homes has failed to keep up with the increase in jobs, population, and consequently, housing		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

																			demand. It is therefore considered that the delivery target will need to further increase to 62,300 homes per annum to address this deficit. The consequences of housing under-delivery have particular significance on economic, societal and physical impacts, notwithstanding those who face homelessness or are forced into poor-quality accommodation. The London Plan Review Report recommended the introduction of a presumption in favour of granting planning permission for proposals which comprise or include residential development on Brownfield (previously developed) land. Local Authorities would be subject to the presumption where they fail to meet their target, a category into which Newham falls (delivering just a handful affordable homes in the first quarter of 2024). In applying the presumption, substantial weight is to be given to the benefits of delivering homes. Should it be adopted, the presumption means granting planning permission as quickly as possible unless the benefits of doing so would be significantly and demonstrably outweighed by any adverse impacts which would arise from not following policies in this Plan – any emerging policy should have regard to this. Most recently, in July 2024, and following the change in administration to Labour, the Deputy Prime Minister gave a statement on changes to national planning policy to respond to the national demand for homes, which included the reintroduction of mandatory local housing targets and changing the standard method used to calculate housing need to better reflect the urgency of housing supply for local areas. Housing targets have since increased from 300k to 370k. Solving the housing crisis is of critical national importance and policy should be shaped to ensure a significant delivery of new homes is achievable. Taking the above into account, for the reasons set out within this letter, Berkeley Homes recommend the delivery of a suitable planning framework to allow Newham to better combat this crisis over the next Plan period. Furthermore, Berkeley Homes support the accelerated delivery of brownfield sites which can make a compelling contribution towards the acute national, regional, and local need for additional housing. *[Note:* *(1)https://www.centreforcities.org/publication/the-housebuildingcrisis/#:~:text=Compared%20to%20the%20average%20European,homes%20a%20year%20is%20reached.* *(2) https://www.building.co.uk/focus/uk-housebuilding-recession-how-much-worse-is-it-going-to-get/5126399.article]*		
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/008	Homes	H1 Meeting Housing Needs						Blank	Blank						Blank	Background – Newham's Housing Delivery At a local level, Newham (including the area of the borough administered by the London Legacy Development Corporation) has one of the largest housing targets in the whole of London, with a requirement to deliver 47,600 homes in the ten years to 2029. Newham has also consistently had the		Comment noted.

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																			highest rates of homeless households in temporary accommodation in the country, with 6,070 residents living in temporary accommodation as of September 2023. Given the above, it is clear that any new Plan will need to incentivise delivery by setting targets that are realistic and deliverable, as well as recognising the role that other high density development can play in meeting the differing needs of residents across the Borough. In addition, the Borough will need to recognise that development will become more viable where cost burdens are reduced, and policy takes a pragmatic approach to introducing a level of flexibility within policies.		
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/021	Homes	H1 Meeting Housing Needs														With specific regard to housing, it is noted that under Newham's 2022 Housing Delivery Test, the Council has been unable to meet its identified housing requirement. As such, a 20% buffer has been applied to the Council's 5-year housing land supply and a Housing Delivery Test Action Plan developed (dated June 2024). Newham's Site Allocation and Housing Trajectory Methodology Note (dated July 2024) acknowledges that taking the delivery shortfall and buffer into consideration would result in the Council having a housing land supply of only 2.14 years, which would be insufficient over the London Plan period. The Council notes that the shortfall stems from delays in delivering allocated sites, with the largest site allocations most affected, rather than a lack of available sites in the borough. The Draft Newham Local Plan intends to overcome the shortfall following the 'Liverpool Method', i.e., spreading housing delivery across the local plan period rather than a five-year period, and, in light of a revised housing target set by the Draft Newham Local Plan, opting for a conservative phasing approach to 'absorb' any unforeseen delays. This methodology is anticipated to deliver a surplus of housing over the proposed plan period to 2037/38, generating a 5.13 years' housing supply. However, this target is set to be reached in 2033/34 and would retain the shortfall of delivery in the first ten years of the Council's new target.		Comment noted.

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Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/023	Homes	H1 Meeting Housing Needs														Whilst it is acknowledged within the Action Plan and Methodology Note that the Draft Newham Local Plan contains 45 potential site allocations for housing to help meet the Council's housing target, we wish to remind the Council of the contribution that windfall sites can also make to housing delivery. Where policy allows, sites such as the Former Nursery Site will be crucial in contributing to the delivery of housing within Newham to ensure the Council can meet their housing targets and meet the objectives of Draft Policy H1 (Meeting Housing Needs).		A change to this policy approach has not been made. We did not consider this change to be necessary as the designation of this site as Metropolitan Open Land is justified in Newham's updated Metropolitan Open Land Review (2025). In addition, Newham's Site Allocation and Housing Trajectory Methodology Note (2024) has identified sufficient capacity for housing without the need to undertake a review of open space designations. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for residential or other uses from coming forward on this site. Any application would be assessed against the policies in the adopted Local Plan. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-178	Royal Docks		Reg19-E-178/034	Homes	H1 Meeting Housing Needs						Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.] <u>Detailed Comments Schedule:</u> The objective of the policy to require development to "optimism site capacity" is welcomed and supported but needs to be reflected in other policy areas such as open space requirements (BFN1 5e).		A change to this policy approach has not been made. We did not consider this change to be necessary as the designation of this site as Metropolitan Open Land is justified in Newham's updated Metropolitan Open Land Review (2025). In addition, Newham's Site Allocation and Housing Trajectory Methodology Note (2024) has identified sufficient capacity for housing without the need to undertake a review of open space designations. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-178	Royal Docks		Reg19-E-178/035	Homes	H1 Meeting Housing Needs			2			Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.] <u>Detailed Comments Schedule:</u> Policy H1.2 includes specific reference to the Newham Characterisation Study (see comments below) as a guiding document. As stated above, this document doesn't appear to include an assessment of viability or the existing planning approvals so the weight attached to it in this policy should be adjusted to reflect that fact.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach is positively prepared, justified and effective. The Characterisation Study has followed the requirements set out in Policy D3 of the London Plan. The Characterisation Study undertook design-led capacity testing of site allocations, informed by evidenced policy requirements in the emerging Local Plan and taking to consideration emerging and approved developments on the sites. Furthermore, a selection of site allocations were viability tested, to ensure the requirements were deliverable. While the viability assessment that supports the plan shows viability challenges in meeting our affordable housing target on allocated sites, 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/008	Homes	H1 Meeting Housing Needs						Blank	Blank						Blank	[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] H1: Meeting housing needs - We believe a minimum guarantee of social rent housing is essential given that is the type of housing the borough needs most.	It should constitute the majority of the net increase of 51,425 to 53,784 new units.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan to be suitably justified to meet objectively assessed need and ensure deliverability. Local Plan Policy H3 prioritises the delivery of social rent homes, requiring that residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/008	Homes	H1 Meeting Housing Needs			1											• H1 – We note that LB Newham is proposing to use a stepped housing trajectory, which in the short term would suggest that their delivery is below their London Plan target. However, we recognise that this is due to the complex and large scale nature of the sites that they have allocated.		Comment noted.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/041	Homes	H1 Meeting Housing Needs														8 Homes 8.1 St William notes that LBN has the second highest housing target in London with a requirement to deliver 32,800 new homes over a ten year period as set out in the adopted London Plan (2021). The Government's recent consultation on the NPPF proposes to increase the annual housing target from 300,000 homes per annum to at least 370,000 homes per annum, specifically recognising that London has fallen behind in meeting its housing needs. Whilst the outcome of the proposed revised method published as part of the NPPF consultation reduces LBN's annual housing target from 4,188 to 2,178 homes per annum there remains strong housing need across the capital. Local planning authorities in London, however, do not use the Government's standard method and instead use the London Plan targets which have increased from 52,000 to 80,000. The duty to cooperate objective in the London Plan will therefore see the Greater London Authority recalibrate the distribution of the 80,000 homes and it is assumed that LBN's housing requirement will be 2,752 homes per annum, a further 574 homes when compared to the standard methodology figure.		Comment noted. The distribution of London's housing need will be determined through the review of the London Plan.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/042	Homes	H1 Meeting Housing Needs														8.2 Delivery rates in the borough have been low – over the last five years only once meeting itsntarget. In total over these five years LBN have only met 71% of its housing target for that period. 8.3 The Site Allocation and Housing Trajectory Methodology Note (July 2024) which has been published as part of the evidence base to the emerging Local Plan confirms that LBN only has a five year land supply of 2.14 years (paragraph 4.7.2) further emphasising the urgent need for new homes across the borough. 8.4 Section 4.7 of the Site Allocation and Housing Trajectory Methodology Note goes on to confirm that LBN does not have sufficient identified housing capacity to meet the Borough's London Plan housing requirement over the course of the London Plan period, with a shortfall of 16,472 units. The Note also states that "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". 8.5 Regardless of the specific housing target that may be attributed to LBN once the new standard method is introduced, it is clear that there is an acute need for housing in LBN both in terms of the number of homes needed but also in terms of meeting local need. St William considers that all of their sites, which are strategic sites within the adopted and emerging Local Plan, provide a significant opportunity in assisting Newham with meeting this substantial housing shortfall as well as delivering housing in the borough that will meet local housing need.		Comment noted.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/043	Homes	H1 Meeting Housing Needs														8.6 Gasworks sites fall within the broader category of 'surplus utility sites within the adopted London Plan and are identified as one of the six strategic sources of housing (Policy H1). Policy H1 of the London Plan is about increasing housing supply and requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites including specifically the six strategic sources of housing. The Mayor's commitment to promoting gas holder sites for housing, is reflected in the approach to remove them from policy objectives set out within economic policies and in particular through the application of the lower Fast Track threshold of 35% affordable housing (instead of 50%) where it can be demonstrated that a gasworks site is subject to extraordinary remediation, enabling and remediation costs (Footnote 59). 8.7 The Sites therefore represent a unique opportunity in the borough to deliver much needed housing on site's located within key growth areas, that are accessible and that have been identified for transformation and that are able to support the creation of new neighbourhoods in the borough in line with the 15 minute city concept. Furthermore, these developments have the potential to deliver a series of environmental, social and economic benefits for local residents and workers including making a positive contribution to LBNs residents' health and wellbeing.		Comment noted. It should be noted that Newham's affordable housing policy does not incorporate the London Plan threshold approach.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/044	Homes	H1 Meeting Housing Needs														Policy H1 Meeting housing needs 8.8 As noted above, there is an acute need for housing in the Borough and LBN plays a strategic role in the delivery of housing within London. St William therefore continues to support the approach outlined in Policy H1 which seeks to enable a net increase of between 51,425 and 53,784 quality homes between 2023 and 2038 by delivering the majority of new housing on site allocations, ensuring developments follow a design-led approach to optimise site capacity.		Support noted. However this policy approach also received comments which raised concerns regarding Newham being unable to meet its 2021 London Plan target within the period of the London Plan. The Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716** Newham is unable to meet its 2021 housing target within the period of the London Plan. However, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/123a		H1 Meeting Housing Needs														LP Policy H1 designates surplus gasworks sites as a strategic source of housing supply. Residential development will meet a particular housing need in Newham. LBNs Site Allocation and Housing Trajectory Methodology Note (December 2022) confirms that Newham is unable to demonstrate a 5 year housing land supply (5YHLS). 4.6.2. Table 10 shows that Newham is unable to demonstrate a 5 year housing land supply when measured against the adopted London Plan housing target. This position is worsened when a 5% buffer is applied to the borough's capacity derived housing target. As per national guidance, shortfall against Newham's previously adopted housing requirement figure has been added to the 5 year supply target (the Sedgefield approach). Taking the shortfall and buffer into consideration Newham only has a five year land supply of 2.69 years. Table 8 demonstrates that Newham also does not have sufficient identified housing capacity to meet the Borough's London Plan housing requirement over the course of the London Plan period, with a shortfall of 15,721 units. § LBN can only demonstrate a 2.69 housing land supply, and confirms that "Newham also does not have sufficient identified housing capacity to meet the Borough's London Plan housing requirement over the course of the London Plan period, with a shortfall of 15,721 units". This is significant and constituted an exceptional circumstance to review the MOL boundaries at this site to help meet this shortfall. The area of land outside of the MOL within the site allocation should have been increased as part of the MOL boundary review. § The Framework recognises that previously developed land can comprises land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.		A change to this policy approach has not been made. We did not consider this change to be necessary as the designation of this site as Metropolitan Open Land is justified in Newham's updated Metropolitan Open Land Review (2025). In addition, Newham's Site Allocation and Housing Trajectory Methodology Note (2024) has identified sufficient capacity for housing without the need to undertake a review of open space designations. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/005	Homes	H1 Meeting Housing Needs														Draft Policy H1 demonstrates the Council's prioritisation of delivering homes which aligns with central Government's substantial housing delivery targets. It is noted that there has been an increase in the housing targets as set out in this policy from Regulation 18 to Regulation 19, which TSP strongly supports and notes the important role of the Local Plan's site allocations in achieving this target. In summary, TSP strongly supports the Spatial Strategy which is consistent with the HPA proposals.		Support noted.

Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/049	Homes	H1 Meeting Housing Needs														To meet the housing targets and assessed demand, the Local Plan policies should be less restrictive, flexibility should be introduced to these policies to support optimising housing delivery to meet housing targets on highly accessible sites. However, TSP does support a focus on housing delivery on site allocations and that site capacities should be optimised through a design-led approach.	The wording of this policy should be expanded to support increased housing delivery in the borough particularly with greater need for housing set out by the Government in the 2024 National Planning Policy Framework (NPPF) consultation.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target relates to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above , the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

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Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/005	Homes	H1 Meeting Housing Needs						No	No							We note that housing need expressed in draft Policy H1 (Meeting housing needs) has increased since the Regulation 18 Plan and now proposes to deliver between 51,425 and 53,784 net additional homes between 2023 and 2038. We welcome the focus on Site Allocations to deliver the majority of this need.		Support noted. However this policy approach also received comments which raised concerns regarding Newham being unable to meet its 2021 London Plan target within the period of the London Plan. The Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716** Newham is unable to meet its 2021 housing target within the period of the London Plan. However, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing.

Reg19-E-225	London Borough of Greenwich		Reg19-E-225/003	Homes	H1 Meeting Housing Needs						Blank	Blank						Blank	Section 3: Policies – Building a fairer Newham BFN1: Spatial Strategy and Homes: H1: Meeting Housing Needs 1.4 The proposed submission for achieving a fairer Newham sets out the spatial strategy for Newham through to 2038. It outlines the London Borough of Newham's 10-year London Plan housing target of 47,600 homes in Newham, one of the largest housing targets in the whole of London. The submission identifies that this target is expected to be achieved between 2019 – 2029. Policy BFN1 (Spatial strategy) outlines that development will be directed to all of Newham's 17 neighbourhoods to distribute the benefits of growth. 1.5 Policy H1 (Meeting housing needs) details that Newham will enable a net increase of between 51,425 and 53,784 residential units from 2023-2038. The policy directs that that this will be achieved through the majority of new units being brought forward by site allocations, as well as optimisation of housing delivery on sites below 0.25 hectares in size and supporting residential developments that come forward on windfall sites. This is supported by a stepped housing trajectory which shows a significant amount of Newham's housing target will be delivered in the medium to long term phase of the plan. 1.6 Section 4.7 on page 38 of Newham's Site Allocation and Housing Trajectory Methodology Note (July 2024) discusses Newham's shortfall against the London Plan 2021 target. Table 12 shows that Newham is unable to demonstrate a 5-year housing land supply measured against the adopted London Plan housing target, which is worsened when a 20% buffer is applied to the borough's London Plan housing target. Table 10 also demonstrates that Newham does not have sufficient identified housing capacity to meet the Borough's London Plan housing requirement over the course of the London Plan period, with a shortfall of 16,472 units. The shortfall of delivery against Newham's London Plan target stems from delays to the delivery of allocated sites within Newham's adopted Local Plan. Newham intends to address this shortfall over the course of its emerging Local Plan period. 1.7 Royal Greenwich appreciates the difficulty the London Borough of Newham is facing in not being able to meet its 10-Year London Plan housing target. However, unfortunately, as demonstrated in Royal Greenwich's Authority Monitoring Report including Five Year Housing Supply Statement, when compared to the five-year supply requirement (including the additional 20% buffer) of 22,798 dwellings (4,560 dwellings per annum), it is evident that Royal Greenwich has a housing land supply of 2.46 years. Royal Greenwich will need to assess all mechanisms for increasing its housing supply under its new Local Plan, including through site allocation and other measures. As such, Royal Greenwich does not have the capacity to meet any of the London Borough of Newham's unmet housing needs.		Comment noted. This comment has been subject to further discussion with London Borough of Greenwich and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes.

Reg19-E-234	Places for London		Reg19-E-234/023	Homes	H1 Meeting Housing Needs						No	No						Blank	Newham is unable to demonstrate a five year housing land supply when measured against the London Plan Housing Target and this is worsened when a 20% buffer is applied to account for past shortfalls in net completions (see Newham's Site Allocation and Housing Trajectory Methodology Note). Only a 2.14 year supply can be demonstrated against the London Plan target and 20% buffer. There is a significant gap between housing targets in the London Plan and the proposed short, medium and long-term annual monitoring targets shown on page 208 of the draft Local Plan. The evidence shows that Newham does not have sufficient identified housing capacity to meet the Borough's London Plan housing requirement over the course of the London Plan period, with a shortfall of 16,472 units. This is a significant shortfall. The draft Local Plan absorbs the LLDC area in Newham. However, there does not appear to have been any commensurate upwards adjustment to reflect this in the Council's annual delivery targets. This will need to be properly explained for at the EiP to demonstrate that the draft Local Plan is sound and in General Conformity with the London Plan. Any unmet housing requirements would need to be properly accounted for in line with the NPPF and soundness tests. Housing supply is clearly a key soundness question for the draft Local Plan. Given the housing delivery challenges, we would expect a more positively prepared and deliverable draft Local Plan policy framework with planning policy expectations designed to ensure that development is deliverable and speed up the planning process wherever possible. However, the draft Local Plan appears to take the opposite approach. For example, the proposed approach to the Fast Track Route in the draft Local Plan would effectively make this unavailable to most applicants in the borough of Newham, in conflict with the London Plan. This is not justified by sufficient evidence in terms of viability and deliverability. [Similarly, the requirements in relation to building heights and open space on key strategic site allocations is unnecessarily prescriptive and restrictive. This is likely to jeopardise or significantly delay the delivery of much needed housing in these locations by placing undeliverable cumulative policy expectations and requirements on development.] We consider that the overall approach in the draft Local Plan should be reconsidered in light of the challenges in terms of meeting identified housing requirements (specifically in terms of the highly prescriptive nature of the policy wording on [site allocations, tall buildings and] the Fast Track Route).		The comment you have provided has not resulted in a change. To clarify, regional policy is clear that Newham's current housing target it set by the 2021 London Plan, which requires Newham to deliver 4,670 homes per annum (including the area formerly planned for by the LLDC). We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery being both justified and effective, being based on realistic evidence of delivery. Furthermore, our proposed affordable housing target is considered to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038.

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																					[…] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. […] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

Reg19-E-234	Places for London		Reg19-E-234/024	Neighbourhoods	H1 Meeting Housing Needs						No	No						Blank	Newham is unable to demonstrate a five year housing land supply when measured against the London Plan Housing Target and this is worsened when a 20% buffer is applied to account for past shortfalls in net completions (see Newham's Site Allocation and Housing Trajectory Methodology Note). Only a 2.14 year supply can be demonstrated against the London Plan target and 20% buffer. There is a significant gap between housing targets in the London Plan and the proposed short, medium and long-term annual monitoring targets shown on page 208 of the draft Local Plan. The evidence shows that Newham does not have sufficient identified housing capacity to meet the Borough's London Plan housing requirement over the course of the London Plan period, with a shortfall of 16,472 units. This is a significant shortfall. The draft Local Plan absorbs the LLDC area in Newham. However, there does not appear to have been any commensurate upwards adjustment to reflect this in the Council's annual delivery targets. This will need to be properly explained for at the EiP to demonstrate that the draft Local Plan is sound and in General Conformity with the London Plan. Any unmet housing requirements would need to be properly accounted for in line with the NPPF and soundness tests. Housing supply is clearly a key soundness question for the draft Local Plan. Given the housing delivery challenges, we would expect a more positively prepared and deliverable draft Local Plan policy framework with planning policy expectations designed to ensure that development is deliverable and speed up the planning process wherever possible. However, the draft Local Plan appears to take the opposite approach. [For example, the proposed approach to the Fast Track Route in the draft Local Plan would effectively make this unavailable to most applicants in the borough of Newham, in conflict with the London Plan. This is not justified by sufficient evidence in terms of viability and deliverability.] Similarly, the requirements in relation to building heights and open space on key strategic site allocations is unnecessarily prescriptive and restrictive. This is likely to jeopardise or significantly delay the delivery of much needed housing in these locations by placing undeliverable cumulative policy expectations and requirements on development.] We consider that the overall approach in the draft Local Plan should be reconsidered in light of the challenges in terms of meeting identified housing requirements (specifically in terms of the highly prescriptive nature of the policy wording on site allocations, tall buildings [and the Fast Track Route]).		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target related to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. Furthermore, in line with policies D9 and D3, locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. The tall buildings assessment fed into the site allocations capacity testing which provides the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above , the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes.

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																					[...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**
Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/001	Homes	H1 Meeting Housing Needs			3			Blank	Blank						Yes	The Homes policy opens with a few paragraphs on Housing Need in Newham. The policy acknowledges acute need in Newham for more social rent, that Newham has the highest rates on homeless households in temporary accommodation and of households living in overcrowded conditions. Please note that although the govt is currently reviewing the NPPF, this plan should anticipate changes to how local housing need is calculated as councils will be expected to consider need for affordable housing and social rent. So the target of 50% social rent on every development is welcomed and		Support noted.
Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/002	Homes	H1 Meeting Housing Needs			3			Blank	Blank						Yes	However, H1. Meeting Housing Need does not include any further information on what types of households are most affected by the lack of quality homes in the borough. There is mention throughout the policy of single homeless people, care leavers, people needing sheltered accommodation, etc. but it would be relevant to outline where the housing need presents itself in the borough in this section.	While the legal minimums may be met, it is clear that this will not end the housing emergency without the following: We believe it would be important to be clearer and more specific about who is most affected by the lack of quality homes in Newham. This would include: • Families – they are most impacted by overcrowded conditions in their homes and really struggle to find family-sized homes that are affordable (below or at Local Housing Allowance rates). • People with additional needs – a task force composed of the Newham Planning and Policy Team and the Occupational Therapy service have identified a lack of adaptable and adapted homes that meet the needs of people with additional needs and learning disabilities. Local organisations and people with lived experience have been consulted on this, so it is essential that this is reflected in this section of the policy. • Asylum seekers and refugees gaining recourse to public funds, who often need homelessness assistance. • Migrants and people with no recourse to public funds, with a particular emphasis on international students and their families, who are particularly vulnerable to destitution. • Single homeless people. • Care leavers.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy had been positively prepared, with consideration of these needs having informed the findings of Newham's Strategic Housing Market Assessment. The need to consider the findings of the borough's Strategic Housing Market Assessment is set out in Policy H4.1b. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/003	Homes	H1 Meeting Housing Needs			3			Blank	Blank						Yes	Even though social rent percentages are mentioned later on in the policy, this section should already include a clear target for social rent homes that take into account setting provisions for social rent homes based on social housing waitlists and reducing homelessness in Newham. It needs to be clearer in the plan because this should be the guiding star when approving development.		A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H3 contains the plan's affordable housing target, which we consider to be positively prepared and justified. 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/004	Homes	H1 Meeting Housing Needs			3			Blank	Blank						Yes	Additionally, there is no acknowledgement of existing dire property conditions, particularly for households living in temporary accommodation in and out of borough provided by the local authority and usually managed by private landlords and property management agencies. [It also does not include any figures on the increasingly high amount of money being spent in temporary accommodation every year.] According to Shelter's Still Living in Limbo report (2023) where research was conducted on 1,112 people living in temporary accommodation: • Three-quarters (75%) of households live in poor conditions, including one in five (21%) with a safety hazard, such as faulty wiring or fire risks. • More than two thirds (68%) of people have inadequate access to basic facilities - such as cooking or laundry facilities. Still Living in Limbo: Why the use of temporary accommodation must end - Shelter England [Hyperlink to https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/still_living_in_limbo]	Additionally, we believe there needs to be a clear acknowledgement in this section of the dire property conditions that many households in Newham are exposed to, particularly in regard to disrepair, damp and mould. While the council now has a new Damp and Mould Strategy and Action Plan, a Damp and Mould Taskforce and a robust PRS and licensing team, it is important to explicitly mention ongoing challenges around these issues to make sure that future buildings, especially those that might end up being used as temporary accommodation in Newham, are fit for habitation and high quality.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H11, which seeks to secure high quality design across all new-build housing, and the climate emergency policies, which seek to ensure homes are well insulated, are considered to be effective. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/005	Homes	H1 Meeting Housing Needs			3			Blank	Blank						Yes	It also does not include any figures on the increasingly high amount of money being spent in temporary accommodation every year.	Finally, we would like to ask that this section includes a mention of the temporary accommodation bill of £20+ million per year, which is exacerbated by the sharp increase in nightly rate accommodation at hotels. This information is important because it should shape the housing need in the borough. If the borough focuses on the provision of safe, decent and genuinely affordable social rent homes to provide families with, this bill can be reduced in the long term.	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan is positively prepared, seeking to deliver high quality affordable housing via policies H3 and H11. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-001	London Gypsies & Travellers		Reg19-E-001/001	Homes	H10 Gypsy and Traveller Accommodation						No	No						Yes	1. First concern: Contradiction between the mention of the need for "23" additional Gypsy and Traveller pitches in Newham in the Local Plan Policies, H10, p.240, and the recommendation of "No target" in the Appendices, Monitoring Framework, Table 16, p. 620. London Gypsies and Travellers recommends that the Policies and the Monitoring Framework documents are made consistent one with the other by explicitly mentioning the target of at least 23 additional pitches on at least one new Gypsy and/or Traveller site, in addition to expanding the existing designated site. Additionally, to keep the Monitoring document alive to new developments including natural population growth, London Gypsies and Travellers recommends including the following wording at Key Performance Indicator No. 33: "Monitor and update Gypsy and Traveller accommodation needs regularly, in line with general housing needs updates to Local Plans, including by considering any emerging evidence prepared by the Greater London Authority or other sources."	1) In the Appendix "Monitoring Framework", Table 16, p. 620, Key Performance Indicator no. 33, in the second column ("Target and scope of monitoring"), insert the following wording: Target construction of 23 additional pitches, spread over several sites including by expanding the existing designated Romany Gypsy site. Prioritize the delivery of new pitches in the next 5 years, by expanding the existing site by 2026, delivering a new site with some 10 pitches by 2027, and delivering a second new site by 2030. Monitor and update Gypsy and Traveller accommodation needs regularly, in line with general housing needs updates to Local Plans, including by considering any emerging evidence prepared by the Greater London Authority and other sources.	The Council's objective for this policy approach is to meet the needs of the Gypsy and Traveller community in Newham, albeit acknowledging the challenges around delivering pitches to meet this need as set out in the Gypsy and Traveller Accommodation Topic Paper. However, the Council recognises the importance of ensuring the Plan is positively prepared and has therefore made the following wording change, which is included in the modification table: [Monitoring indicator 33 - Target and Scope of monitoring section] ~~No target.~~ **23 pitches between 2022 and 2038.** Monitor proportionately compared to need identified in the Gypsy and Traveller Accommodation Assessment and any emerging evidence prepared by the Greater London Authority.
Reg19-E-001	London Gypsies & Travellers		Reg19-E-001/002	Homes	H10 Gypsy and Traveller Accommodation						No	No						Yes	2. Second concern: The lack of timeframe for delivering new pitches and sites in the Monitoring Framework. The construction of 23 additional pitches on at least one new site would correspond to the evidence presented in ORS's 2022 Newham Council Gypsy and Traveller Accommodation Assessment (GTAA) for the period up to 2038. In relation to the timeframe for delivering these pitches, London Gypsies and Travellers notes that there is another robust source of evidence in the London-wide accommodation assessment of 2008, which identified the need for 19 new pitches in Newham by 2017 (Fordham Research, London Boroughs' Gypsy and Traveller Accommodation Needs Assessment, 2008, https://www.london.gov.uk/sites/default/files/london_boroughs_gypsy_and_traveller_accommodation_needs_assessment_-_final_report_-_2008_-_fordham_research.pdf p.116). These 19 pitches were never built, therefore their delivery could be designated as urgent, in 2024, with a view to redressing decades of neglect. In this context it is worth noting that ORS's Newham GTAA found three households who were homeless, whose situation is demonstrably critical, and this figure is likely to be an underestimate considering the poor reach of the assessment among Gypsies and Travellers living in standard "bricks and mortar" housing (see London Gypsies and Travellers' interview with ORS for the Stakeholder Topics on 18 March 2022).	London Gypsies and Travellers recommends setting chronological targets that reflect this urgency and critical situation, such as 2026 for expanding the existing site, 2027 for delivering a new site with some 10 pitches, and 2030 for delivering a second new site, and then update these needs periodically as with all housing needs.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy approach is justified and effective for the reasons set out in the Gypsy and Traveller Topic Paper. This topic paper highlights the deliverability challenges of providing new sites for pitches in the borough, particularly given the significant areas of available land in the borough being in flood zones. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-001	London Gypsies & Travellers		Reg19-E-001/006	Homes	H10 Gypsy and Traveller Accommodation						No	No						Yes	4. Fourth concern: Absence of provisions for a transit site and for negotiated stopping arrangements The Local Plan does not mention the need for accommodating Gypsy and Traveller caravans making stops in Newham as they pursue their nomadic way of life in any of its documents. The lack of accommodation for nomadic Gypsy and Traveller families making stops in Newham is particularly disappointing because the borough has adopted a hostile approach to the nomadic way of life, with an injunction against persons unknown issued on 31 May 2024. The injunction was aimed at evicting people making a stop with a caravan at Barrington Playing Fields, which is an abandoned and empty site at E12 6JH. Such injunctions against "persons unknown" (who could have been identified), has the potential of pushing Gypsies and Travellers into the criminal justice system as a result of being forced to make stops that are impossible to authorise because there are no authorised temporary stopping places and no negotiated stopping arrangements. Evictions that may render people homeless violate local authorities main duty of housing, and in 2020 the Court of Appeal found similar policies to be inadmissible because they failed to meet welfare and housing needs, and in 2023 the Supreme Court judged that overly broad injunctions violated Gypsies and Travellers' rights when issued in the context of the absence of transit sites (The Court of Appeal, Bromley LBC v Persons Unknown and others [2020], para 104 (a-e); and The Supreme Court, Wolverhampton City Council and others (Respondents) v London Gypsies and Travellers and others (Appellants), Judgment given on 29 November 2023). London Gypsies and Travellers Recommends that Newham's Local Plan is amended to make provisions for a transit site and to identify suitable types of locations for negotiated stopping approaches, particularly in light of the rich history of Gypsy and Traveller presence in the area over centuries, which forms part of the diversity of London, and is documented in a collectively designed map with the communities' landmarks: https://lgtheritage.communitymaps.org.uk/project/london-from-the-19th-to-the-mid-20th-century-yards-commons-and-green-corridors/contribution/24946?center=51.5183:0.0429:14&tab=1 .	3) Under Policy H10 (Gypsy and Traveller accommodation), add point 5: **Newham Local Authority will identify land suitable for transit sites and for negotiated stopping in order to accommodate nomadic families making stops in the borough.**	The Council's objective for this policy approach is help meet the needs of Newham's Gypsy and Traveller community. However, the Council recognises the importance of ensuring the Plan is positively prepared to meet the needs of people requiring transit sites and negotiated stopping areas and has therefore drafted the following modification, which will be presented to the Inspector for their consideration:,: ~~3.~~ **1.** The designated Gypsy and Traveller site is safeguarded as a site for Gypsy and Traveller accommodation. ~~4.~~ **2.** Developments that propose accommodation for Gypsies, Travellers and Travelling Showpeople, including those for new sites and pitches **and transit sites and sites for negotiated stopping**, will be supported where they meet identified need. ~~5.~~ **3.** Developments that propose accommodation to meet these needs of Gypsies, Travellers and Travelling Showpeople should be located: a. outside of the Green Belt or Metropolitan Open Land, unless there are very special circumstances; and b. **where they are providing permanent accommodation,** in flood zone 1 or exceptionally in flood zone 2, subject to meeting the requirements of Local Plan Policy CE7; and **c. where they are providing transit sites and sites for negotiated stopping, in flood zone 1, in flood zone 2 where a sequential test is passed, or exceptionally in flood zone 3, subject to meeting the requirements of Local Plan Policy CE7; and** ~~c~~**d**. on sites that can provide the associated necessary (primarily physical) infrastructure requirements to service the needs of a development or wider site; and ~~d~~**e**. on land that provides safe access to the highway and should not result in any unacceptable impact on the capacity and environment of the highway network; and ~~e~~**f**. the site is in a sustainable location, appropriate for residential development and in reasonable proximity to relevant services and facilities, including transport, education, healthcare and other relevant social infrastructure provision. ~~6.~~ **4.** Developments that propose accommodation to meet the needs of Gypsies, Travellers and Travelling Showpeople should: a. provide an appropriately detailed management plan; and b. demonstrate that quality standards have been co-designed in consultation with representatives of the local Gypsy, Traveller and Travelling Showpeople community.
Reg19-E-015	Greater London Authority		Reg19-E-015/014	Homes	H10 Gypsy and Traveller Accommodation														Gypsy and Traveller accommodation Policy H10 of the draft Plan safeguards an existing Gypsy and Traveller site in the borough and sets out broad criteria for new sites. To be consistent with LP2021 Policy H14, LBN should set out the borough's ten year pitch requirements and plan to meet those needs. The Mayor is finalising work on the London-wide Gypsy and Traveller		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as we consider the policy approach is justified and effective for the reasons set out in the Gypsy and Traveller Topic Paper. This topic paper highlights the deliverability challenges of providing new sites for pitches in the borough, particularly given the significant areas of available land in the borough being

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																			Accommodation Needs Assessment. Until complete, LBN should rely on its latest evidence which indicates a need for 23 pitches. It should be made clear whether the existing Gypsy and Traveller site has capacity to meet identified need over the Plan period. If not, LBN will need to plan to meet this.		in flood zones. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the lack of a specific monitoring indicator on the number of pitches the Council needs to deliver. In light of these comments, the Council recognises the importance of ensuring the Plan is justified and therefore has made the following wording change, which is included in the modification table: ~~No target.~~ **23 pitches between 2022 and 2038.** Monitor proportionately compared to need identified in the Gypsy and Traveller Accommodation Assessment and any emerging evidence prepared by the Greater London Authority.
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/002	Homes	H10 Gypsy and Traveller Accommodation														<u>Gypsy and Travellers</u> We note that LB Newham has a need of 23 pitches for Gypsy and Travellers, although it is not clear to us how much of this need is expected in the first 5 years. For the purpose of the future examination, we would like to set out that LB Barking and Dagenham will be unable to take on any unmet Gypsy and Traveller from Newham. LB Barking and Dagenham currently has its own 5-year unmet need that it has proposed to address later in its Plan period and therefore would be unable to assist for the purpose of this Local Plan review.		Comment noted. This comment has been subject to further discussion with The London Borough of Barking and Dagenham and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/106	Homes	H10 Gypsy and Traveller Accommodation														No comment.		Comment noted.

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Reg19-E-225	London Borough of Greenwich		Reg19-E-225/004	Homes	H10 Gypsy and Traveller Accommodation						Blank	Blank						Blank	Section 3: Policies – Homes: Policy H10 Gypsy and Traveller accommodation 1.8 National Planning Policy instructs local authorities to provide housing provision to accommodate a range of different groups including travellers. Policy H10 identifies that the designated Gypsy and Traveller site is safeguarded as a site for Gypsy and Traveller Accommodation, and that developments that propose accommodation for Gypsies, Travellers and Travelling Showpeople, including those for new sites and pitches, will be supported where they meet an identified need. Policy H10 does not list the location of Newham's designated site, however, this is identified on their Draft Newham Local Plan Reg 19 policies (2024) map as Parkway Crescent. 1.9 In the London Borough of Newham's Duty to Co-operate report in paragraph 4.41, the Council notes that currently the Draft Submission Local Plan allocates one site as a safeguarded Gypsy and Traveller accommodation site (an existing site containing 15 pitches). The Council furthers that the safeguarding of this site does not count towards meeting identified future need, although there is scope to extend the site by a few pitches. In paragraphs 4.47-4.49 of the report, the Council details that given the recent update to the Planning Policy for Traveller Sites, Newham currently have not identified any additional sites in the Draft Submission Local Plan to meet the accommodation needs of the 23 identified in their Gypsy and Traveller Needs Assessment. 1.10 Paragraph 4.48 of the same report furthers that given the location of the majority of Newham's site allocations are on land susceptible to flood risk, it is unlikely Newham will be able to deliver permanent pitches on identified site allocations in the plan. As such, they seek to meet the need for 23 pitches primarily through Newham Council's Small Sites Options Appraisals and Modular construction programme. In paragraph 4.49 Newham details that they may seek to initiate conversations with neighbouring boroughs if Newham do not identify sufficient sites to meet their need. Royal Greenwich does not have the capacity to provide additional pitches to provide accommodation for gypsy and traveller communities who may reside in Newham.		Comment noted. This comment has been subject to further discussion with The Royal Borough of Greenwich and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes.

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Reg19-E-007	David Gilles		Reg19-E-007/032	Homes	H11 Housing Design Quality						Blank	Blank						Blank	H11 P259: Where is "Newham's forthcoming 'Housing design needs study' guidance" and what does it say about tall buildings—see above.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the now published evidence base to positively prepared, justified and effective. The guidance relates to the housing design needs of neurodivergent residents and residents with learning disabilities, and has been prepared using evidence of local housing needs, analysis of existing housing design and detailed engagement with residents. It is not unusual for plans to commit to producing supplementary planning guidance to support Local Plan policies. We are also planning to consult on the study in 2025. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-021	Watkin Jones		Reg19-E-021/018	Homes	H11 Housing Design Quality			6			Blank	Blank						Blank	Policy H11(6) applies to PBSA however part (e) which refers to play space. This should not apply to PBSA as this does not generate a need for such infrastructure.		The Council's objective for this policy approach is to meet our evidenced need to improve residents access to greenspaces, including shared amenity spaces, and deliver high quality housing. However, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: e. **where the development is likely to be used by children and young people,** provide onsite play provision in accordance with both the requirements of London Plan 2021 Policy S4 and Local Plan Policies GWS5 and, where relevant, D2. Of-site play space will only be supported in exceptional circumstances where it can be demonstrated that it would lead to the provision of facilities, accessible to the development site, which are of greater quality and quantity than can be provided onsite.

Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/007	Homes	H11 Housing Design Quality			H11.3e			Blank	Blank						Blank	Policy H11 - Housing design quality Part 3e e. Purpose-built student accommodation should provide either: i. ten per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300- 2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice; or ii. 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice. Unite make the following comments on Part 3e of Policy H11: 1. The requirements for conventional residential accommodation should not be applied to student housing as, in reality, the typical demand from students per annum falls significantly below the 10% mark. This is a steady and consistent trend as evidenced by Unite's longer term experience. 2. Indeed, Unite have over 157 PBSA properties across the UK with 32 buildings in the London portfolio. Of these c.12,712 London bedrooms, they have provision for 728 students that may need a wheelchair room. This is over 5.7% of the total London rooms. For the 2022 / 2023 academic year, Unite had 6 students in need of wheelchair sized rooms out of an approximate total of c.12,712 bedrooms. This equates to a 0.05% take up and thus demonstrates the exceptionally low need for accessible bedrooms, significantly below the 10% and 15% levels proposed in the draft policy. 3. Students who require accessible provision are likely to be catered for by universities themselves in accommodation on or directly adjacent to campuses to reduce the distance the student needs to travel. 4. The 10% requirement was introduced in order to help meet a shortfall in wheelchair accessible housing within conventional housing. Generally, those who live in conventional dwellings are of an older demographic thus the percentage of those who have a disability and require wheelchair accessibility is far greater than the demographic affiliated with student accommodation. The normal age range of students is between 18 and 25, explaining why there has never been a shortfall in wheelchair provision within student housing. 5. Furthermore, the draft Policy above has been based on the GLA's PBSA LPG, which went out for consultation between October 2023 and January 2024. There have been no further updates on this document since the consultation closed and thus the document remains in draft form, unadopted. Unite objected to the accessible room requirements set out in the LPG during the consultation period on the basis of the	Recommendations On the basis of the above comments, Unite make the following recommendation to align with both previous comments from Inspectors and Building Regulations: • The 10% requirement should be removed, and accessible requirements should instead defer to building regulation requirements of 1% fitted out with a further 4% adaptable for PBSA	The Council's objective for this policy approach is to be positively prepared and justified, meeting the needs of disabled students. However, the Council recognises the importance of ensuring the Plan is effective and therefore proposes to support the following wording change: e. Purpose-built student accommodation should provide **accessible student accommodation in accordance with the requirements of 'Box 3: Accessible Student Accommodation Standards' set out in the London Plan Guidance: Purpose-built Student Accommodation (October 2024).** ~~either:~~ ~~i. ten per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300- 2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice; or~~ ~~ii. 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice.~~

																			points both above and below. Ultimately, the draft guidance sought to retrospectively apply London Plan Policy E10, which was not drafted with the intention of applying to PBSA. 6. The wording of London Plan Policy E10 is clear that the accessible requirements set out within the policy apply to 'serviced accommodation'. It does not state anywhere in the policy text, nor the supporting text, that the requirements should also be taken to apply to PBSA accommodation. Nor does it state that the accessible requirements set out in Policy E10 should be taken to apply to all forms of development for which the same Building Regulations that are most appropriate to serviced accommodation may also apply. These clarifications followed representations made by Unite to the London Plan Examination in Public (EIP). This therefore does not apply to PBSA developments and to introduce such requirement would be to directly contradict the London Plan. 7. Such an application of this policy is entirely unsound. The London Plan (2021) and the associated Inspector's Report further confirm that the 10% requirement links only to new dwellings to which Building Regulations Part M Volume 1 are applicable. At no point during the consultation on the London Plan nor during the Examination in Public was it considered, or put forward, that this would be the applicable intention of the policy. Thus, the application of the policy in this way is not supported by any evidence base, has not been subject to appropriate consultation, and has not been subject to examination by an Inspector. 8. Additionally, the Building Regulations and planning policy are separate documents. PBSA and serviced accommodation is not considered nor assessed in the same way in planning terms. It would not be considered appropriate to apply the other policy objectives relevant to visitor accommodation to PBSA simply on the basis that they are considered in the same way under the Building Regulations. 9. As well as participation at the EIP for the London Plan, Unite have also made representations and participated at EIPs for various Local Plans across London. The outcomes of such participation in relation to accessible requirements are relevant to the draft guidance, and are detailed as follows: - Draft policy P5 of the draft Southwark Local Plan sought to require 10% of student rooms to be easily adaptable for occupation by wheelchair users. Following Unite's participation at EIP, Inspectors concluded the following at paragraph 79 of their report (enclosed in full at Appendix B): "As submitted, Policy P5 would require 10% of student rooms to be easily adaptable for occupation by wheelchair users. We have found little specific justification for the 10% figure, noting that a reduced figure of 5% is more than likely to surpass actual demand based on evidence from university admissions. Accordingly, the 10% figure should be replaced with 5% so that the Plan		

																		would be justified." - As a result of Unite's representations, the following text is included at paragraph 6.2.63 of the supporting text to policy BH7 of the Brent Local Plan: "To ensure that residential accommodation meets needs over time, London Plan policy requires 10% wheelchair accessible/ easily adaptable dwellings. The accommodation covered by this policy is likely to be meeting needs of specific sectors of the population. On this basis the council will be willing to depart from the minimum 10% wheelchair where evidence is compelling to indicate why it might not be appropriate e.g. where occupants are less likely to suffer from mobility disabilities compared to the general population." - Draft policy H6 of the draft Islington Local Plan south to require 10% of bedspaces to be wheelchair accessible. Following Unite's participation at EIP, Inspectors concluded the following at paragraph 77 of their report: "Policy H6 at Part B (ii) requires 10% of bedspaces to be wheelchair accessible. Detailed evidence has been provided by some PBSA providers that shows the likely need for such bedspaces is much lower. SDMM24 is therefore required to reduce this to 5% to ensure the Policy is justified. We note that the GLA are of the view that Policy E10(H) of the London Plan is relevant which requires the provision of 10%. However, we are content that local evidence specific to Islington justifies a lower figure in this case." 10. It is relevant to note from these outcomes that prior to the release of the GLA Guidance Note concerning accessible requirements from PBSA (which was acknowledged in the Inspector's Report for the Islington Local Plan), that no Local Planning Authority nor Inspector considered the requirements of Policy E10 to apply to PBSA. 11. Regardless, it can be seen that both Inspector's and Local Planning Authorities have previously accepted the overwhelming evidence provided by Unite in relation to such requirements both prior to and following the release of the GLA Guidance Note. 12. In any case, Unite operate a policy of meeting the needs of an individual user and not applying a one size fits all policy. Indeed, should individual bedrooms need to be adapted; this can be done quickly and relatively easily to meet requirements. Unite have undertaken such additional alterations in discussion with the end user and provided a bespoke solution to a student's needs.		
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/050	Homes	H11 Housing Design Quality			H11.6										Unnecessary Repetition. Part 1 refers to All new residential development, which should therefore include affordable housing. Paragraph 16E of the NPPF seeks to avoid unnecessary duplication		A change to this policy approach has not been made. We did not consider this change to be necessary as part 1 of the policy is relevant to all forms of housing (for example general needs and specialist housing), while part 6 specifically relates to those developments that include affordable housing. The Council is satisfied that the

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																					plan remains sound without the proposed changes.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/030	Homes	H11 Housing Design Quality						Blank	No						Blank	In general, we support the simplification of requirements		Support noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/031	Homes	H11 Housing Design Quality						Blank	No						Blank	[In general, we support the simplification of requirements] however, these still remain highly restrictive and reduce the ability for high-quality design solutions to respond to the local context and including them would further reduce the ability to meet housing need without any improvement in design quality.	We therefore recommend that the requirements are further simplified by referring to meeting the adopted Housing Design Standards LPG rather than repeating requirements or adding unnecessarily prescriptive design requirements.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as this policy approach is to ensure the best quality design of homes. The Council is satisfied that the plan remains sound without the proposed changes. However this policy also received comments which raised concerns regarding the difficulty of deliverability of the policy in different urban scenarios. The Council recognises the importance of ensuring the Plan is consistent. The Council acknowledges that there was a slight contradiction between policy H11 2.e and supporting text and has therefore made the following wording change to ensure clarity and consistency, which is included in the modification table: e. **provide an adequate boundary treatment to ground floor street-facing amenity space and** locate ~~any~~ ground floor private amenity spaces away from **roads that are a source of significant noise, air quality or visual impacts.** ~~street-facing facades.~~

Homes Comments to the [full Regulation 19 Representations]

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Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/024	Homes	H11 Housing Design Quality						Blank	No						Blank	[Appendix 2 - Representations Part 1] GL support the simplification of housing standard requirements [but recommend referring to the adopted Housing Design Standards LPG to avoid repeating the requirements.]	GL [support the simplification of housing standard requirements but] recommend referring to the adopted Housing Design Standards LPG to avoid repeating the requirements.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as this policy approach seeks to embed important design requirements that deliver high quality design in new homes. The majority of these requirements are derived from the Housing Design Standards LPG, and embedding them in Local Plan policies ensures that they will continue to be delivered when the London Plan and associated guidance is updated. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the deliverability of the policy requirement in relation to ground floor street facing private amenity provision in different urban scenarios. The Council recognises the importance of ensuring the Plan is consistent. The Council acknowledges that there was a slight contradiction between policy H11 2.e and supporting text and has therefore made the following wording change to ensure clarity and consistency, which is included in the modification table: e. **provide an adequate boundary treatment to ground floor street-facing amenity space and** locate ~~any~~ ground floor private amenity spaces away from **roads that are a source of significant noise, air quality or visual impacts.** ~~street facing facades.~~

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/033	Homes	H11 Housing Design Quality			2.c			Blank	Blank						Blank	Draft Policy H11: Housing Design Quality Draft Policy H11 seeks to ensure that housing developments are design for long term comfort and flexibility. Berkeley Homes is aligned with LBN's ambition to deliver high quality homes. Notwithstanding this, we provide comments on this policy to ensure that sites are able to come forward and able to be adaptable to market forces and site specific circumstances. On this basis, we comment on the following points of Draft Policy H11. 2(b) ensure the number of dual-aspect dwellings are maximised, including all three or more bedroom dwellinghouses (C3) which must be dual-aspect Berkeley Homes recognises the benefit of maximising dual aspect homes. Notwithstanding this, there are sometimes site specific circumstances that mean delivering dual aspect homes in three or more bedroom homes is challenging. We therefore consider that this policy will result in challenges in delivering family homes, which may in turn stifle the quantum that a developer is able to provide or result in additional costs which may have a bearing on viability and affordable housing delivery.	Therefore, Berkeley Homes would welcome additional flexibility into this policy and suggest the following: 2(b) ensure the number of dual-aspect dwellings are maximised, including all three or more bedroom dwellinghouses (C3) which must be dual-aspect, **subject to site specific circumstances**	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers policy H11 2.c to be in conformity with the Housing Design Standards B2.3 and C4.1 which promote deck access typology and require new homes to be dual aspects 'unless exceptional circumstances make it impractical or undesirable'. In line with C4.1 which states 'where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces', policy H11 2.c clearly sets the expectation of family homes to be dual aspects. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/034	Homes	H11 Housing Design Quality			4			Blank	Blank						Blank	[Draft Policy H11: Housing Design Quality Draft Policy H11 seeks to ensure that housing developments are design for long term comfort and flexibility. Berkeley Homes is aligned with LBN's ambition to deliver high quality homes. Notwithstanding this, we provide comments on this policy to ensure that sites are able to come forward and able to be adaptable to market forces and site specific circumstances. On this basis, we comment on the following points of Draft Policy H11.] With regard to point 4 of this policy, we note reference to Newham's forthcoming 'housing design needs study': 4. Development referable to the Mayor of London should design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study' guidance. Without this document available, we are not able to provide specific commentary, however, we encourage LBN to ensure that this is a balanced document that does not fetter the delivery of social rented homes within the borough. Berkeley Homes would also welcome the opportunity to be consulted on this document once available.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the now published evidence base to positively prepared, justified and effective. The guidance relates to the housing design needs of neurodivergent residents and residents with learning disabilities, and has been prepared using evidence of local housing needs, analysis of existing housing design and detailed engagement with residents. It is not unusual for plans to commit to producing supplementary planning guidance to support Local Plan policies. We are also planning to consult on the study in 2025. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/035	Homes	H11 Housing Design Quality			5.a			Blank	Blank						Blank	[Draft Policy H11: Housing Design Quality Draft Policy H11 seeks to ensure that housing developments are design for long term comfort and flexibility. Berkeley Homes is aligned with LBN's ambition to deliver high quality homes. Notwithstanding this, we provide comments on this policy to ensure that sites are able to come forward and able to be adaptable to market forces and site specific circumstances. On this basis, we comment on the following points of Draft Policy H11.] We note point 5 of this policy seeks to add additional requirements with regard to the delivery of external communal amenity spaces: a. provide 50m2 for the first ten residential units or private rooms (if not self-contained) and 1m2 for each additional residential unit or private room (if not self-contained) As required of the London Plan, any new development should come forward through a design led process. With this in mind, we note that there is increasingly scarce brownfield sites left in London. On this basis, architects will need to be able to design schemes with flexibility to ensure the remaining brownfield sites (of which are likely the most constrained) are able to come forward. Whilst Berkeley Homes recognises the importance of communal amenity, we consider that this should be able to come forward as part of this design led process and able to react to any site specific constraints to ensure schemes are optimised for the delivery of homes.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers policy H11 5.a to be justified. The importance of accessing shared amenity space is evidenced in the Newham Characterisation Study, Chapter 9 Borough wide Design Principles, p.295 which provides guidance and recommendations specific to Newham context. More information on green space deficiency in the borough can be found in Newham Green and Water Infrastructure Strategy and are highlighted in Site Allocations Infrastructure Requirements when required. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/023	Homes	H11 Housing Design Quality														Policy H11: Housing design quality Hadley is again supportive of the inclusion of housing design requirements to ensure well-designed homes for Newham residents, that seek to promote the health and well-being of residents. Hadley agrees with changes made to Policy H11 in response to earlier comments to remove overly prescriptive and potentially onerous design requirements for planning applications.		Support noted.

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Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/024	Homes	H11 Housing Design Quality														[Policy H11: Housing design quality] Hadley recognises the need to maximise the number of dual aspect homes but requests more flexibility in the policy requiring all three or more bedroom dwellings to be dual aspect and limiting single-aspect dwellinghouses. Due to changing regulations, it may not always be possible to provide that all family homes or residential units in general have dual aspect. Enhanced aspect homes should be supported where it can be demonstrated that an exceptional living quality is provided and dual aspect has been maximised across the scheme.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers policy H11 2.c to be in conformity with the Housing Design Standards B2.3 and C4.1 which promote deck access typology and require new homes to be dual aspects 'unless exceptional circumstances make it impractical or undesirable'. In line with C4.1 which states 'where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces', policy H11 2.c clearly sets the expectation of family homes to be dual aspects. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/025	Homes	H11 Housing Design Quality														[Policy H11: Housing design quality] Hadley objects to the requirement to "locate any ground floor private amenity spaces away from streetfacing facades". This does not consider sites which are bounded by the street on all sides, or how planting and other mitigation measures can be used to protect these places from potential street impacts. This policy is also considered too prescriptive as this could then apply to quiet streets which seems to negate the objective of the policy.		The Council's objective for this policy approach is to ensure the best quality design of homes. However, the Council recognises the importance of ensuring the Plan is consistent. The Council acknowledges that there was a slight contradiction between policy H11 2.e and supporting text and has therefore made the following wording change to ensure clarity and consistency, which is included in the modification table: e. **provide an adequate boundary treatment to ground floor street-facing amenity space and** locate ~~any~~ ground floor private amenity spaces away from **roads that are a source of significant noise, air quality or visual impacts.** ~~street facing facades.~~
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/053	Homes	H11 Housing Design Quality														Policy H11 Housing design quality 8.36 St William continues to support the principle of delivering high quality housing design. This approach aligns with St William's own objectives to deliver high quality homes that strengthen communities and improve people's lives. 8.37 A design-led approach as a means of optimising site capacity (as set out in draft Policy D3 and Policy D3 of the London Plan) is dependent on delivering high quality developments and homes and this policy is supported.		Support noted.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/054	Homes	H11 Housing Design Quality			H11. 2d				No							8.38 As currently drafted, Policy H11 provides relatively detailed guidance and it is on that basis that St William have a number of specific comments to make in line with their previous comments: § Part 2 (d) requires new housing to be designed to avoid single-aspect dwellinghouses, particularly where north facing. Whilst the benefit of dual aspect homes are recognised, in design terms this is often not possible due to site-specific restraints and viability issues and therefore policy should be re-worded to encourage dual-aspect homes, where feasible. In addition updated building regularions have addressed some of the concerns related to ventilation and overheating in single aspect homes. Therefore where it can be demonstrated that single aspect accommodation can be designed to give high quality accommodation and improving the efficiency of buildings therefore reducing cost, and being able to deliver more homes (including affordable homes) they should not be limited.	[Appendix 12: General Policies – Suggested amendments] 2. All new general needs housing should be designed to: d. ~~avoid~~ **seek to reduce** single-aspect dwellinghouses (C3) **where feasible**, particularly where these are north-facing; and	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers policy H11 2.d to be in conformity with the Housing Design Standards B2.3 and C4.1 which promote deck access typology and require new homes to be dual aspects 'unless exceptional circumstances make it impractical or undesirable'. Those circumstances will be assessed on a case-by-case basis at planning application stage but they will be considered exceptional. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/055	Homes	H11 Housing Design Quality			H11. 2e				No							§ Part 2 (e) requires ground floor private amenity spaces to be located away from streetfacing facades. By virtue of the fact that LBN is urban in nature and most if not all development sites are subject to a number of site constraints, it is not considered that this policy objective can always be achieved. St William suggests that this part of the policy is re-worded to encourage private amenity spaces to be located away from street facing facades, where feasible.	[Appendix 12: General Policies – Suggested amendments] [2. All new general needs housing should be designed to:] ~~e. locate any ground floor private amenity spaces away from street-facing facades.~~	Comment noted. This comment has been subject to further discussion with St William and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. The Council recognises the importance of ensuring the Plan is consistent. The Council acknowledges that there was a slight contradiction between policy H11 2.e and supporting text and has therefore made the following wording change to ensure clarity and consistency, which is included in the modification table: e. **provide an adequate boundary treatment to ground floor street-facing amenity space and** locate ~~any~~ ground floor private amenity spaces away from **roads that are a source of significant noise, air quality or visual impacts.** ~~street-facing facades.~~

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/056	Homes	H11 Housing Design Quality			H11. 4				No							§ Part 4 requires development that is referrable to the Mayor to design a proportion of social rent rooms in accordance with the recommendations of LBNs forthcoming 'Housing design needs study' guidance. St William is not aware of and has not seen this guidance that is referenced and therefore is unable to comment as the contents of this guidance is not known. This approach is therefore not considered to be positively prepared, justified or effective and therefore fails to meet the tests of soundness in the NPPF. This part of the policy should be removed.	[Appendix 12: General Policies – Suggested amendments] ~~4. Development referable to the Mayor of London should design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study' guidance.~~	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the now published evidence base to positively prepared, justified and effective. The guidance relates to the housing design needs of neurodivergent residents and residents with learning disabilities, and has been prepared using evidence of local housing needs, analysis of existing housing design and detailed engagement with residents. It is not unusual for plans to commit to producing supplementary planning guidance to support Local Plan policies. We are also planning to consult on the study in 2025. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/057	Homes	H11 Housing Design Quality			H11. 5				No							§ Part 5 seeks to ensure major residential developments incorporate shared amenity spaces that foster social interaction and a sense of community, which is supported. External communal amenity spaces are expected to provide 50 sqm for the first ten units or private rooms and 1 sqm for each additional unit or private room. Whilst St William always seek to maximise their open space and communal amenity space provision, site specific circumstances and constraints can sometimes preclude standards from being met and in those instances communal amenity provision must be considered in the round, in the context of other amenity space being delivered on site as well as the overall quality of the development and public benefits being delivered. St William have suggested some adjustments to the wording of this policy in Appendix 12.	[Appendix 12: General Policies – Suggested amendments] 5. Major residential developments should incorporate shared amenity spaces that foster social interaction and a sense of community. External communal amenity spaces should be designed to: a. provide 50m2 for the first ten residential units or private rooms (if not self-contained) and 1m2 for each additional residential unit or private room (if not self-contained), **where feasible**;	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers policy H11 5.a to be justified. The importance of accessing shared amenity space is evidenced in the Newham Characterisation Study, Chapter 9 Borough wide Design Principles, p.295 which provides guidance and recommendations specific to Newham context. More information on green space deficiency in the borough can be found in Newham Green and Water Infrastructure Strategy and are highlighted in Site Allocations Infrastructure Requirements when required. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/022	Homes	H11 Housing Design Quality														The draft Local Plan includes a series of highly prescriptive proposed requirements relating to the design/provision of housing and associated amenity space. This is principally contained in Draft Policy H11. The HPA for Silvertown is supported by a Design Code which establishes design rules for the development of the site and future Reserved Matters Applications will need to demonstrate compliance with it. TSP has an outstanding general concern about the prescriptiveness of emerging policy acting as a barrier to a design-led approach which optimises density and maximises quality. TSP considers that these standards may be more appropriately directed to planning guidance rather than adopted policy.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as this policy approach seeks to embed important design requirements that deliver high quality design in new homes. The majority of these requirements are derived from the Housing Design Standards LPG, and embedding them in Local Plan policies ensures that they will continue to be delivered when the London Plan and associated guidance is updated. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the deliverability of the policy requirement in relation to ground floor street facing private amenity provision in different urban scenarios. The Council recognises the importance of ensuring the Plan is consistent. The Council acknowledges that there was a slight contradiction between policy H11 2.e and supporting text and has therefore made the following wording change to ensure clarity and consistency, which is included in the modification table: e. **provide an adequate boundary treatment to ground floor street-facing amenity space and** locate ~~any~~ ground floor private amenity spaces away from **roads that are a source of significant noise, air quality or visual impacts.** ~~street facing facades.~~
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/053	Homes	H11 Housing Design Quality			Policy H11 (1)(a)											The proposed Housing Design Quality standards are generally supported, however, there are proposed requirements which are highly prescriptive and have the potential to restrict the design-led approach to achieving high-quality design. The level of detail far exceeds that typically found in a policy and is better suited to a supplementary planning guidance document, much of which is already contained in the GLA's Housing Design Standards. The following detailed representations are made: • Part 1(a) – clarity is required on what qualifies as irregular geometry that limits reconfiguration of internal layouts;		A change to this policy approach has not been made. We did not consider this change to be necessary as implementation text H11.1 is clear on design requirements and layout's assessment to ensure potential future reconfiguration. Examples of irregular geometry that can respond to dual aspect dwelling definition, while also being able to support potential layout reconfiguration, are shown in fig. A3.1.1 p.36 of the Design Housing Standards London Plan Guidance (June 2023). The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/054	Homes	H11 Housing Design Quality			Policy H11 (2)(b)											The proposed Housing Design Quality standards are generally supported, however, there are proposed requirements which are highly prescriptive and have the potential to restrict the design-led approach to achieving high-quality design. The level of detail far exceeds that typically found in a policy and is better suited to a supplementary planning guidance document, much of which is already contained in the GLA's Housing Design Standards. The following detailed representations are made: • Part 2(b) – the requirement to reduce the number of outdoor amenity space of the bedroom is very specific. It is queried if this would be more appropriate to express in guidance.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers policy H11 2.b to be in conformity with the Housing Design Standards C10.3 which requires private amenity spaces to be accessed by kitchen/dining room 'unless the specific circumstances make this impractical'. Those circumstances will be assessed on a case-by-case basis at planning application stage but they will be considered exceptional. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/055	Homes	H11 Housing Design Quality			Policy H11 (2)(c)											The proposed Housing Design Quality standards are generally supported, however, there are proposed requirements which are highly prescriptive and have the potential to restrict the design-led approach to achieving high-quality design. The level of detail far exceeds that typically found in a policy and is better suited to a supplementary planning guidance document, much of which is already contained in the GLA's Housing Design Standards. The following detailed representations are made: • Part 2(c) – there may be situations where street facing ground floor bedrooms are acceptable depending on the nature of the street and the extent of proposed setbacks.		Comment noted. You made a representation on H11 2.c, however we assume it refers to H11 2.e. This comment has been subject to further discussion with The Silvertown Partnership and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. The Council recognises the importance of ensuring the Plan is consistent. The Council acknowledges that there was a slight contradiction between policy H11 2.e and supporting text and has therefore made the following wording change to ensure clarity and consistency, which is included in the modification table: e. **provide an adequate boundary treatment to ground floor street-facing amenity space and** locate ~~any~~ ground floor private amenity spaces away from **roads that are a source of significant noise, air quality or visual impacts.** ~~street facing facades.~~

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/056	Homes	H11 Housing Design Quality			Policy H11 (5)											The proposed Housing Design Quality standards are generally supported, however, there are proposed requirements which are highly prescriptive and have the potential to restrict the design-led approach to achieving high-quality design. The level of detail far exceeds that typically found in a policy and is better suited to a supplementary planning guidance document, much of which is already contained in the GLA's Housing Design Standards. The following detailed representations are made: • Part 5 – while the proposals for Silvertown include shared amenity spaces, a prescriptive area-based requirement raises concerns and could have implications for the achievability of optimised high density development. A blanket approach is not considered to be correct given other factors such as the proximity to open spaces have a bearing on the amount of communal space that is appropriate.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers policy H11 5.a to be justified. The importance of accessing shared amenity space is evidenced in the Newham Characterisation Study, Chapter 9 Borough wide Design Principles, p.295 which provides guidance and recommendations specific to Newham context. More information on green space deficiency in the borough can be found in Newham Green and Water Infrastructure Strategy and are highlighted in Site Allocations Infrastructure Requirements when required. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/36	Homes	H11 Housing Design Quality														Policy H11: Housing design quality Ballymore always strives to provide high quality housing, both internally and externally, including flexible internal layouts that provide future residents with multiple options for how to decorate their spaces. Ballymore has over 40 years of experience delivering large scale developments using qualified and competent designers in all their schemes to ensure a high standard of living for all residents. We note the previously proposed requirement to provide a minimum of two alternative furniture layouts for each habitable has been removed following consultation on the Regulation 18 plan, which we support.		Support noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/37	Homes	H11 Housing Design Quality			2(d)											Part 2(d) of the draft policy seeks to avoid single-aspect units, particularly where these are north-facing. Ballymore agrees that north-facing single aspect units should preferably be avoided but a proportion of single aspect units is often unavoidable within a scheme, particularly with other competing requirements (including recent fire guidance changing requiring the provision of two stair cores in all buildings over 30m) which makes it even more difficult to provide dual aspect units without significantly reducing the number of units per core and therefore reducing the viability and deliverability of schemes.	We therefore suggest that part 2(d) of the draft policy is amended to the following: '**maximise dual aspect units and avoid single aspect north-facing units**'.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers policy H11 2.d to be in conformity with the Housing Design Standards B2.3 and C4.1 which promote deck access typology and require new homes to be dual aspects 'unless exceptional circumstances make it impractical or undesirable'. Those circumstances will be assessed on a case-by-case basis at planning application stage but they will be considered exceptional. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/38	Homes	H11 Housing Design Quality			7 and 8											Parts 7 and 8 of the policy relate to accessible homes, noting that social rented homes that are wheelchair user homes should be designed to meet Building Regulation M4[3](2)(b) standard (wheelchair accessible dwellings).	It should be clarified that market and intermediate wheelchair homes are required to meet Building Regulation M4[3](2)(a) standard (wheelchair adaptable) rather than the higher M4[3](2)(b) standard.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is effective, with flexibility to deliver market or affordable M4[3](2)(a) dwellings to meet need where needed. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/012	Homes	H11 Housing Design Quality			3			Yes	No						Yes	There is no mention throughout this policy document of emergency accommodation. While this can be included in wider temporary accommodation, it is essential to differentiate the two in this section and make it clear that a percentage of newly built temporary accommodation needs to be specifically for emergency accommodation. Due to shortages of purpose-built emergency accommodation, especially in borough, families are being placed in hotels and B&Bs for months while they wait for a decision on their homelessness duty. This is often longer than the legally permissible 6 weeks for households with dependent children and they tend to be in accommodation with no kitchens nor washing facilities. The other option is to be accommodated on very short notice away from borough, schools, work and support networks. Morris + Co have written new guidance on family emergency accommodation, which contains spatial guidance, delivery models and a feasibility study. This has been attached to this submission for your consideration.	Emergency accommodation will always be necessary to house households facing immediate homelessness. It is imperative that this policy mentions this kind of accommodation explicitly and links its use to the housing need in the borough. We ask that you review the guidance attached and consider including some of its recommendations to the Local Plan.	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan seeks to meet Newham's objectively assessed need for housing of different types and tenures. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 provide more affordable and family homes in Newham, while Policy H11 seeks to ensure new housing in the borough is high quality, regardless of tenure or contract by which they are rented. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/015	Homes	H11 Housing Design Quality														[I am getting in touch on behalf of Shelter London and the Newham Temporary Accommodation Action Group to make a joint submission to the Newham Local Plan Consultation. Please find attached: · The response form. · The Equalities Data form. · Shelter's Brick by Brick report, which contains a plan to deliver the social homes we need to end the housing emergency: Report on social housing - Shelter England · The final report on International Students in a Post-Pandemic Cost of Living Crisis, which is referenced in our submission.] · Two pieces of guidance from Morris + Co on how to build suitable emergency accommodation for young people and families, which is also referenced in our submission. o Young People: https://morrisand.company/assets/3_We-Recommend_PUBLISH.pdf o Families: https://morrisand.company/assets/Research-Report_FINAL_231101-lowres.pdf		Comment noted. The two hyperlinks are broken. However, the Local Plan seeks to deliver high quality accommodation to meet the needs of people currently in emergency accommodation through policies H3, which seeks to prioritise the delivery of social rent accommodation, policy H4, which seeks to deliver more family-sized accommodation, and policy H11, which seeks to deliver high quality accommodation in all forms of housing developments. Policy H2 also includes an exception to allow for the conversion of family homes for a temporary period to meet the needs of single homeless people.

Reg19-C-012	Bavani Navaratnam		Reg19-C-012/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes	Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.		Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accomodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accomodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-013	Mariam Paul		Reg19-C-013/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes	Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.		Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accomodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accomodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-014	Rohima Shila		Reg19-C-014/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes		Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.	Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-015	Sabina John		Reg19-C-015/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes	Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.		Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-016	Balbir Kaur		Reg19-C-016/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes	Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.		Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council therefore proposes the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftrustforlondon.org.uk%2Fdata%2Ftopics%2Fhousing%2F%3Ftab%3Dtemporary-accommodation-borough&data=05%7C02%7CAntonia.Marja

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Reg19-C-019	Thayalini Kamalakaran		Reg19-C-019/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes		Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.	Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-020	Devaki		Reg19-C-020/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes	Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.		Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-021	Andy Lambell		Reg19-C-021/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes		Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.	Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-024	Just Homes Charity		Reg19-C-024/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes	Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.		Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-025	Gabriel Ogunkoya		Reg19-C-025/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes		Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.	Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-026	Alister Probert		Reg19-C-026/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes		Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.	Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-030	Aslam Virk		Reg19-C-030/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes		Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.	Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-031	Santhamalar Mylvakanam		Reg19-C-031/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes	Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.		Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-C-032	Shafiul Ali Akther		Reg19-C-032/004	Homes	H2 Protecting and improving existing Housing						Yes	Yes						Yes		Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.	Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-E-019	Delia Taasin		Reg19-E-019/005	Homes	H2 Protecting and improving existing Housing														Reflection on the present Housing situation: Currently, many Hotels and Bed and Break Fast accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.		Comment noted. Our assessment of housing need, the Strategic Housing Market Assessment, considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham. However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council has therefore made the following clarification modifications to the implementation and justification texts of HS8 which is included in the modification table: [HS8.2 implementation] ~~Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF.~~ **When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.** **Where existing visitor accomodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accomodation.** [HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. **Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country** [add footnote reference to **Trust for London, Housing and homelessness (2024)**, hyperlinked to https://eur03.safelinks.protection.outlook.c

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Reg19-E-021	Watkin Jones		Reg19-E-021/002	Homes	H2 Protecting and improving existing Housing					H2.1	Blank	Blank						Blank	Loss of Specialist Forms of Accommodation Firstly, we consider the lack of protection for the above residential tenures. The draft Local Plan should offer clearer support for large scale purpose built shared living (LSPBSL) given that it is form of specialist housing that can support a mixed and balanced approach to need in the Borough as supported London-wide within the London Plan. Furthermore, in respect of Policy H9, the justification text (paragraph 3.191) states: "Latest housing needs evidence suggests that recent graduates are increasingly occupying houses in multiple occupation given pressures on the availability of social housing and rising private rents. Accordingly, there is a necessity in Newham to balance the need to protect family housing from conversion while also allowing for the delivery of new houses in multiple occupation that are of a high-quality and affordable to young people." It would therefore seem appropriate for Policy H2 to protect existing PBSA and LSPBSL. Both forms of housing currently have very challenging policy expectations in the draft Local Plan. This suggests that the Council are not necessarily supportive of these tenures even though both have important roles in the modern housing market, as recognised in the London Plan.	The policy justification for Policy H2 (p211) states "Given recent evidence of housing needs in Newham, we do not consider there is a need to specifically protect purpose-built student accommodation floorspace, or large-scale purpose built shared living floorspace from redevelopment." We recommend that this sentence is deleted from the Plan. Firstly this runs contrary to policies elsewhere that recognise both existing and future needs for PBSA across the Borough. If PBSA is lost then this should be factored in the operation of Policy 8.	A change to this policy approach has not been made. We did not consider this change to be necessary as policy H8 and H9 set out policy requirements for the provision of these forms of accommodation to meet need. Policy H2 only applies specific protections for affordable, family and specialist homes (assessed under Policy H6), recognising the need to not undermine our ability to meet the significant need for these forms of accommodation. We remain confident that purpose-built student accommodation will be delivered and isn't required to meet our priority housing needs, unlike the forms of housing the policy is seeking to protect. Therefore policy is justified. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/100	Homes	H2 Protecting and improving existing Housing														No comment.		Comment noted.
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/009a	Homes	H2 Protecting and improving existing Housing						Blank	Blank						Blank	[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] H2: Protecting and improving existing housing - We recognise the damage which the demolition of housing does to our communities and our environment. We strongly believe there should be a policy0backed presumption in favour of retrofit and refurb of existing housing, with demolition only being considered if the buildings in question are structurally unsound.	[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] […] - Housing, whether retrofitted or demolished, should be reprovided like for like at the same rent levels tenures, and same number of units. […].	Comment noted. Policy CE3 considers embodied carbon and the circular economy. This includes how a building is built, how construction waste can be minimised, how a building could be deconstructed in future, and how future modification/ adaption/ retrofitting could occur. Major development will be expected to meet embodied carbon limits of less than 500kg CO2/m2 - which evidence suggests can be delivered at no additional cost. Developers will also have to apply circular economy principles and reduce embodied carbon including by demonstrating that retaining and reusing existing buildings and structures (including incorporating the fabric of existing buildings into the new development) have been fully explored before considering substantial demolition.

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Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/009b	Homes	H2 Protecting and improving existing Housing						Blank	Blank						Blank	[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] H2: Protecting and improving existing housing [...] - We are concerned about pt3, which gives reasons when family unit to HMO will be permitted. Given the need for family-sized units, we think these should only ever be permitted in exceptional circumstances. We are aware that families can end up in overcrowded HMOs due to a lack of family-sized units.		A change to this policy approach has not been made. We did not consider this change to be necessary as this is an effective adopted policy that has operated well, and only allows for conversions where the resultant housing would be higher quality than the existing family unit. A range of policies in the Plan already effectively balance the need to meet the need for family homes, as evidenced in the SHMA, and the need for temporary accommodation. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/006	Homes	H2 Protecting and improving existing Housing			4			Blank	Blank						Yes	H2.4. refers to turning family dwellinghouses into HMOs to meet housing need. Policy seems quite generous with enabling conversion of family dwellinghouses into smaller properties or HMOs. It also does say that the HMOs need to be high-quality. However, this policy does not seem to be well-safeguarded, and it is unclear how this has been weighed in against the increasing need for family-sized properties in the borough. Advocacy and support agencies in the borough have been campaigning to stop families from being placed in HMOs via section 17 of the Children Act 1989 by children's services. We don't want this work to be undermined by having an increase in creation of HMOs in the borough. Language should be clearer to limit this option and to make it clear that the quality needs to be higher than existing.	We ask that language is made clearer to limit this option (conversion) and to make it clear that the quality needs to be higher than existing.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as policy H2.4 only allows for conversion of family homes on a temporary basis, and to specifically meet the needs of Newham Care Leavers or homeless single people in Newham, rather than families. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan effectively meets the needs of the Council services who will be involved in housing people in the accommodation and has therefore made the following wording change, which is included in the modification table: 4. Development that results in the subdivision or conversion of a family dwellinghouse (C3) with three or more bedrooms to meet the housing needs of Newham Care Leavers or homeless single people in Newham or people who are owed a homelessness duty by the Council may be acceptable. In these circumstances, proposals will be given a temporary change of use planning permission of up to five years. Any application would be expected to be accompanied by evidence to demonstrate that the property would be used as: a. a house in multiple occupation (C4) for up to six sharers for sole use by Newham Care Leavers; or b. a house in multiple occupation for the sole use by Newham's ~~Temporary Accommodation service~~ **Council** for people who are owed a homelessness duty or single homeless people; and [...] This policy sets out an exception to allow for the conversion of family homes to houses in multiple occupation where housing is for the sole use by Newham Care Leavers or homeless single people in Newham or people owed a homelessness duty by Newham Council. Accommodation placements for these groups should be made directly by the London Borough of Newham, with the definition of 'Newham Care Leavers' set out in the Local Plan glossary. The policy requirement should be secured either via a time-limited planning permission or through a section 106 agreement. The mechanism for securing the permission will be directed by the case officer for the application. Care leavers accommodation provided through this exception should be for up to six sharers. Accommodation for single homeless people in Newham or people owed a homelessness duty by Newham Council can either be designed as a house in multiple occupation (up to six sharers) or as a large house in multiple occupation (between seven and ten sharers). Conversions under this part are expected to meet the requirements of Policy H6 and

																					Policy H9, including requirements for residential management plans and **agreed** ~~capped~~ rent levels. Proposals should also meet the relevant housing quality requirements of Policy H11 (see Table 13). To meet the requirements of this policy, the use of the housing specifically for Newham Care Leavers **or,** ~~,~~ homeless single people in Newham or people owed a homelessness duty by the London Borough of Newham should be included in the description for the planning permission, alongside the temporary period the planning permission is sought for. Applicants, as part of their planning submission, should provide evidence of discussions with Newham's ~~Temporary Accommodation~~**relevant commissioning** service**(s)** ~~, and the Council's Children's commissioners where relevant~~ which show the length of time the accommodation will be required for. This will inform the length of time the temporary consent is granted for. Temporary periods for the use should be five years or fewer, and should have regard to the policy provisions for meanwhile uses set out in policy BFN1.8. Before submitting a planning application, Newham's ~~Temporary Accommodation service (who also help facilitate the housing of children leaving care)~~ **relevant commissioning service(s)** ~~and the Council's Children's commissioners, where relevant,~~ should be contacted by the applicant in order to confirm that the accommodation provision is appropriate and to confirm the rents proposed would be suitable (thereby demonstrating compliance with H9.2). This evidence should be submitted alongside the planning application. The Council's ~~Temporary Accommodation~~ **relevant commissioning** service**(s)** ~~and the Council's Children's commissioners, where relevant,~~ will also be consulted as part of the application process, to confirm these details are correct. On the expiration of the temporary period secured through the planning permission, the accommodation should be reverted back to its lawful use as a single family dwellinghouse and any facilitating works removed. **Where residents are eligible for support under the Care Act 2014, these needs should be met via supported and specialist accommodation, and will be considered under Local Plan Policy H6 rather than this policy.** Given the evolving picture of need for these forms of accommodation, if Newham's ~~Temporary Accommodation~~**relevant commissioning** service ~~and/or relevant commissioners~~ state that these forms of accommodation are no longer needed, planning permission will not be granted for the change of use under this exception clause. For the purposes of H2.4.c, major roads are key arterial routes and local and destination routes that have town centres and local centres situated along them and/or are A roads within the borough.

Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/009	Homes	H2 Protecting and improving existing Housing			4			Blank	Blank						Yes		Additionally, we wish to see a real commitment to consulting Temporary Accommodation service and the Council's Children's Commissioners as part of the application process. We agree with this, but these two teams are notoriously busy and already overwhelmed by the increasing number of homeless people in the borough. In order to do this, there needs to be a safeguarded time for these teams to be contacted or even for additional staff to be hired to build capacity. This may not need to be an explicit element of the policy document, but it needs to be taken into account and considered.	The Council's objective for this policy approach is to support the commissioning teams who help to meet the needs of Newham Care Leavers and homeless single people in Newham. However, the Council recognises the importance of ensuring the Plan effectively meets the needs of the Council services who will be involved in housing people in the accommodation. The amended wording seeks to ensure all teams involved in the housing of homeless residents and care leavers can effectively use the policy. We will continue to have discussions on the appropriate methods to implement this policy requirement with the relevant commissioning teams. We have therefore made the following wording change, which is included in the modification table: 4. Development that results in the subdivision or conversion of a family dwellinghouse (C3) with three or more bedrooms to meet the housing needs of Newham Care Leavers or homeless single people in Newham or people who are owed a homelessness duty by the Council may be acceptable. In these circumstances, proposals will be given a temporary change of use planning permission of up to five years. Any application would be expected to be accompanied by evidence to demonstrate that the property would be used as: a. a house in multiple occupation (C4) for up to six sharers for sole use by Newham Care Leavers; or b. a house in multiple occupation for the sole use by Newham's ~~Temporary Accommodation service~~ **Council** for people who are owed a homelessness duty or single homeless people; and [...] This policy sets out an exception to allow for the conversion of family homes to houses in multiple occupation where housing is for the sole use by Newham Care Leavers or homeless single people in Newham or people owed a homelessness duty by Newham Council. Accommodation placements for these groups should be made directly by the London Borough of Newham, with the definition of 'Newham Care Leavers' set out in the Local Plan glossary. The policy requirement should be secured either via a time-limited planning permission or through a section 106 agreement. The mechanism for securing the permission will be directed by the case officer for the application. Care leavers accommodation provided through this exception should be for up to six sharers. Accommodation for single homeless people in Newham or people owed a homelessness duty by Newham Council can either be designed as a house in multiple occupation (up to six sharers) or as a large house in multiple occupation (between seven and ten sharers). Conversions under this part are expected to meet the requirements of Policy H6 and

																					Policy H9, including requirements for residential management plans and **agreed** ~~capped~~ rent levels. Proposals should also meet the relevant housing quality requirements of Policy H11 (see Table 13). To meet the requirements of this policy, the use of the housing specifically for Newham Care Leavers **or,** ~~,~~ homeless single people in Newham or people owed a homelessness duty by the London Borough of Newham should be included in the description for the planning permission, alongside the temporary period the planning permission is sought for. Applicants, as part of their planning submission, should provide evidence of discussions with Newham's ~~Temporary Accommodation~~**relevant commissioning** service**(s)** ~~, and the Council's Children's commissioners where relevant~~ which show the length of time the accommodation will be required for. This will inform the length of time the temporary consent is granted for. Temporary periods for the use should be five years or fewer, and should have regard to the policy provisions for meanwhile uses set out in policy BFN1.8. Before submitting a planning application, Newham's ~~Temporary Accommodation service (who also help facilitate the housing of children leaving care)~~ **relevant commissioning service(s)** ~~and the Council's Children's commissioners, where relevant,~~ should be contacted by the applicant in order to confirm that the accommodation provision is appropriate and to confirm the rents proposed would be suitable (thereby demonstrating compliance with H9.2). This evidence should be submitted alongside the planning application. The Council's ~~Temporary Accommodation~~ **relevant commissioning** service**(s)** ~~and the Council's Children's commissioners, where relevant,~~ will also be consulted as part of the application process, to confirm these details are correct. On the expiration of the temporary period secured through the planning permission, the accommodation should be reverted back to its lawful use as a single family dwellinghouse and any facilitating works removed. **Where residents are eligible for support under the Care Act 2014, these needs should be met via supported and specialist accommodation, and will be considered under Local Plan Policy H6 rather than this policy.** Given the evolving picture of need for these forms of accommodation, if Newham's ~~Temporary Accommodation~~**relevant commissioning** service ~~and/or relevant commissioners~~ state that these forms of accommodation are no longer needed, planning permission will not be granted for the change of use under this exception clause. For the purposes of H2.4.c, major roads are key arterial routes and local and destination routes that have town centres and local centres situated along them and/or are A roads within the borough.

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Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/010	Homes	H2 Protecting and improving existing Housing			4			Blank	Blank						Yes	Additionally, there is no mention of accessibility. With a high number of residents in Newham living with a disability or additional needs, it is essential that the policy is explicit in guaranteeing that a percentage of all property conversions is kept or made accessible and adapted or adaptable. This can be done in consultation with adult social care and the occupational therapy service.	In terms of accessibility, we would like to see specificity in what property conversions need to be kept or made accessible, with particular focus on ground floor properties and buildings where there is a lift. This is relevant for both single homeless people and families. We would also want to add to the policy that Adult Social Care and Occupational Therapy Service will be consulted as part of the application process for this kind of properties. Same considerations about time and capacity as above would apply here.	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H11 sets requirements for the delivery of accessible and adaptable properties in conformity with the requirements of the London Plan. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-244	One Newham		Reg19-E-244/041	Homes	H2 Protecting and improving existing Housing														But in some cases the sense of belonging and offer of community support is best provided in mainly residential communities. We hope this will be true of the approved plans to redevelop Bonny Downs Church, E6 as a co-housing project in partnership with NEWway and BDCA. Our aim is to provide move-on accommodation for people experiencing homelessness, with the wraparound care and support they will need to become independent in the longer term. As a community we are also exploring purchasing properties to provide further move-on accommodation. The difficulty is the current block on establishing HMOs. This is understandable when these are designed purely to maximise income with poor management leading to anti-social behaviour and disruption to communities. However, with careful management and monitoring, bona fide charities such as NEWway should be able to buy and manage homes where three or four guests can be supported into independent living and permanent work. The current Article 4 restrictions means investing in property is capped to just two people per home, which makes this plan financially unviable. The finances also rely on Enhanced Housing Benefit rates- in turn increasing the Council burden and excluding the tenant from gainful employment- as the rent is tied to support and does not encourage paid work. By increasing tenant numbers in suitable homes and using Universal Credit (and salary) for the rent, the support to tenants can be provided in existing community projects, such as Bonny Downs and NEWway. Investors are interested in this model, and talks are already in progress. This model makes the support sustainable using community assets, it is person centred rather than financially-driven andremoves the reliance on Housing Benefit costs. Again, this joint LBN/voluntary sector approach could really help many individuals flourish in independent living and reduce benefit and support costs.		A change to this policy approach has not been made. We did not consider this change to be necessary as our policies protecting family homes from conversion are positively prepared and justified by our evidence of housing need. The Plan already effectively balances the need to meet the need for family homes, as evidenced in the SHMA, and the need for temporary accommodation. The policy does set out some exceptional circumstances where conversion of family homes to smaller units will be acceptable, including where homes will meet the housing needs of homeless single people in Newham or people who are owed a homelessness duty by the Council, provided the conversion is for a temporary basis. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan effectively meets the needs of the Council services who will be involved in housing people in the accommodation that meets the housing needs of homeless single people in Newham and has therefore made the following wording change to Policy H2, which is included in the modification table: 4. Development that results in the subdivision or conversion of a family dwellinghouse (C3) with three or more bedrooms to meet the housing needs of Newham Care Leavers or homeless single people in Newham or people who are owed a homelessness duty by the Council may be acceptable. In these circumstances, proposals will be given a temporary change of use planning permission of up to five years. Any application would be expected to be accompanied by evidence to demonstrate that the property would be used as: a. a house in multiple occupation (C4) for up to six sharers for sole use by Newham Care Leavers; or b. a house in multiple occupation for the sole use by Newham~~'s Temporary Accommodation service~~ **Council** for people who are owed a homelessness duty or single homeless people; and [...] This policy sets out an exception to allow for the conversion of family homes to houses in multiple occupation where housing is for the sole use by Newham Care Leavers or homeless single people in Newham or people owed a homelessness duty by Newham Council. Accommodation placements for these groups should be made directly by the London Borough of Newham, with the definition of 'Newham Care Leavers' set out in the Local Plan glossary. The policy requirement should be secured either via a time-limited planning permission or through a section 106 agreement. The mechanism for securing the

																					permission will be directed by the case officer for the application. Care leavers accommodation provided through this exception should be for up to six sharers. Accommodation for single homeless people in Newham or people owed a homelessness duty by Newham Council can either be designed as a house in multiple occupation (up to six sharers) or as a large house in multiple occupation (between seven and ten sharers). Conversions under this part are expected to meet the requirements of Policy H6 and Policy H9, including requirements for residential management plans and **agreed** ~~capped~~ rent levels. Proposals should also meet the relevant housing quality requirements of Policy H11 (see Table 13). To meet the requirements of this policy, the use of the housing specifically for Newham Care Leavers **or,** ~~,~~ homeless single people in Newham or people owed a homelessness duty by the London Borough of Newham should be included in the description for the planning permission, alongside the temporary period the planning permission is sought for. Applicants, as part of their planning submission, should provide evidence of discussions with Newham's ~~Temporary Accommodation~~**relevant commissioning** service**(s)**~~, and the Council's Children's commissioners where relevant~~ which show the length of time the accommodation will be required for. This will inform the length of time the temporary consent is granted for. Temporary periods for the use should be five years or fewer, and should have regard to the policy provisions for meanwhile uses set out in policy BFN1.8. Before submitting a planning application, Newham's ~~Temporary Accommodation service (who also help facilitate the housing of children leaving care)~~ **relevant commissioning service(s)** ~~and the Council's Children's commissioners, where relevant,~~ should be contacted by the applicant in order to confirm that the accommodation provision is appropriate and to confirm the rents proposed would be suitable (thereby demonstrating compliance with H9.2). This evidence should be submitted alongside the planning application. The Council's ~~Temporary Accommodation~~ **relevant commissioning** service**(s)** ~~and the Council's Children's commissioners, where relevant,~~ will also be consulted as part of the application process, to confirm these details are correct. On the expiration of the temporary period secured through the planning permission, the accommodation should be reverted back to its lawful use as a single family dwellinghouse and any facilitating works removed. **Where residents are eligible for support under the Care Act 2014, these needs should be met via supported and specialist accommodation, and will be considered under Local Plan Policy H6 rather than this policy.**

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																					Given the evolving picture of need for these forms of accommodation, if Newham's ~~Temporary Accommodation~~**relevant commissioning** service ~~and/or relevant commissioners~~ state that these forms of accommodation are no longer needed, planning permission will not be granted for the change of use under this exception clause. For the purposes of H2.4.c, major roads are key arterial routes and local and destination routes that have town centres and local centres situated along them and/or are A roads within the borough.
Reg19-C-012	Bavani Navaratnam		Reg19-C-012/002	Homes	H3 Affordable housing						Yes	Yes						Yes	It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.		Support noted.
Reg19-C-013	Mariam Paul		Reg19-C-013/002	Homes	H3 Affordable housing						Yes	Yes						Yes	It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.		Support noted.
Reg19-C-014	Rohima Shila		Reg19-C-014/002	Homes	H3 Affordable housing						Yes	Yes						Yes		It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.	Support noted.
Reg19-C-015	Sabina John		Reg19-C-015/002	Homes	H3 Affordable housing						Yes	Yes						Yes	It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.		Support noted.
Reg19-C-016	Balbir Kaur		Reg19-C-016/002	Homes	H3 Affordable housing						Yes	Yes						Yes	It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.		Support noted.
Reg19-C-019	Thayalini Kamalakaran		Reg19-C-019/002a	Homes	H3 Affordable housing						Yes	Yes						Yes		It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.	Support noted.
Reg19-C-020	Devaki		Reg19-C-020/002	Homes	H3 Affordable housing						Yes	Yes						Yes	It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.		Support noted.
Reg19-C-021	Andy Lambell		Reg19-C-021/002	Homes	H3 Affordable housing						Yes	Yes						Yes		It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.	Support noted.

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Reg19-C-024	Just Homes Charity		Reg19-C-024/002	Homes	H3 Affordable housing						Yes	Yes						Yes	It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.		Support noted.
Reg19-C-025	Gabriel Ogunkoya		Reg19-C-025/002	Homes	H3 Affordable housing						Yes	Yes						Yes		It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.	Support noted.
Reg19-C-026	Alister Probert		Reg19-C-026/002	Homes	H3 Affordable housing						Yes	Yes						Yes		It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.	Support noted.
Reg19-C-030	Aslam Virk		Reg19-C-030/002	Homes	H3 Affordable housing						Yes	Yes						Yes		It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.	Support noted.
Reg19-C-031	Santhamalar Mylvakanam		Reg19-C-031/002	Homes	H3 Affordable housing						Yes	Yes						Yes	It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.		Support noted.
Reg19-C-032	Shafiul Ali Akther		Reg19-C-032/002	Homes	H3 Affordable housing						Yes	Yes						Yes		It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.	Support noted.
Reg-19-D-EH-001	Sharon Fell		Reg-19-D-EH-001/003	Homes	H3 Affordable housing	N13.SA2 East Ham Primark									Blank	No		Blank	Are these homes going to be affordable? (By Newham wages standards). Are all other new builds on High St occupied to warrant this build?		A change to this policy approach has not been made. We did not consider this change to be necessary as the plan is positively prepared, with site allocations being required to deliver affordable housing in line with the requirements of policy H3. The Council is required to deliver more homes within the borough to meet both Newham and London's wider needs for housing delivery. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-001	London Gypsies & Travellers		Reg19-E-001/004	Homes	H3 Affordable housing						No	No						Yes	3. Third concern: The omission of specific provisions for specialist housing adjusted for nomadic ways of life in "Our Newham Local Plan: HOMES", [Policies H1 (Meeting housing needs),] H3 (Affordable housing) [and H4 (Housing mix)]. This neglect in pitch and site provisions has forced Gypsies and Travellers, whose recognized ethnic identities are protected under the Race Equality Act, and whose protected characteristic is their culture and heritage of nomadism, to resign themselves to living in standard "brick and mortar" accommodation. Their protected characteristic was legally recognized in 2020 in the Court of Appeal judgment that the "Gypsy and Traveller community have an enshrined freedom not to stay in one place but to move from one place to another". According to the 2021 UK census, approximately 390 people identifying as Gypsy or Traveller were residents of Newham. Fewer than a fifth of Newham's Gypsies and Travellers lived on the designated site. The needs of the other four fifths, those who are living in standard "bricks and mortar" housing, are imperfectly known, due to the methodological limitations of ORS's Newham GTAA, with the exception of one Irish Traveller family who have been campaigning for culturally appropriate housing with adjustments for nomadism for years, to no avail. Nevertheless, all Gypsies and Travellers in Newham have the right to culturally appropriate housing, as a human right detailed in the UN Committee on Economic, Social and Cultural Rights, General Comment 4: The right to adequate housing (Article 11 (1) of the International Covenant on Economic Social and Cultural Rights), 13 December 1991, para 8(g); and also General Comment 21: Right of everyone to take part in cultural life (Article 15, para 1(a), of the International Covenant on Economic, Social and Cultural Rights), 21 December 2009, para 16(e), which are covered by Article 8 of the UK Human Rights Act. London Gypsies and Travellers recommends that the right to culturally appropriate adequate housing, including with adjustments for nomadism, is mainstreamed in all housing policies by explicit mention in Policies [H1 (Meeting housing needs),] H3 (Affordable housing) [and H4 (Housing mix)], because Gypsies and Travellers live in a variety of tenures and situations.	[2) Under Policies H1 (Meeting housing needs), H3 (Affordable housing) and H4 (Housing mix), add the wording in bold to the existing wording in regular font:] [at H3.180]: "In particular, Newham residents need access to more social rent homes. The Newham Strategic Housing Market Assessment (SHMA) 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. **Furthermore, the Gypsy and Traveller residents of Newham seek to rent social and affordable accommodation that is culturally appropriate for people with a heritage of nomadism, according to the Gypsy and Traveller Accommodation Assessment.**"	This wording change is not supported. We did not consider this change to be necessary as the policy is positively prepared, and seeks to prioritise the delivery of social rent homes above other affordable housing tenures. These would help to meet the needs of Newham residents, including members of the Gypsy and Traveller community in the borough. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-007	David Gilles		Reg19-E-007/002	Homes	H3 Affordable housing						Blank	Blank						Blank	The worst of these is that although the R19D now contains a commitment to providing 50% Social housing (SH) on all development sites the justification for this has been hedged around by officers with a number of caveats that will encourage developers to think that it is an optional requirement. See below. Some further work is required to remedy the R19D in this and two other material respects. The first is the evidence base where the R19D, even now, does not fully take account of the current and still increasing number of homeless acceptances and housing need more generally in Newham. There is an opportunity here to evidence even more compelling and robustly the need for social housing in Newham. The SHMA is now 2 years old. It should be updated in this respect. The second is via a further edit of the R19D to delete references and comments that almost "invite" developers to ignore the 50% SH requirement. The way forward might be to find language that describes viability assessments in such a way that there does not appear to be a 'get out' clause for developers. This is particularly material when one of the matters promised by the newly elected Government is a reform of the NPPF. This will be amplified during the R19 consultation as appropriate.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan to be suitably justified to meet objectively assessed need and ensure deliverability. Our methodology for calculating housing need included looking at the specific need to deliver social rent homes in Newham, and this methodology has not been contested in response to the Local Plan. Further evidence of need is unnecessary to make this case. As well as ensuring the plan is positively prepared and justified, national policy requires us to demonstrate the plan is deliverable. Our viability evidence shows that is not possible in all circumstances to viably deliver our affordable housing target. Our approach to requiring viability assessments where policy targets cannot be met is therefore consistent with national policy, including planning practice guidance on deliverability. It is important in demonstrating the plan will be effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/004	Homes	H3 Affordable housing						Blank	Blank						Blank	3 Statistics More generally, while some sources, references and justifications have been updated in the R19D, not all have. For example, housing need in Newham could be even more strongly evidenced in the draft by drawing on the most recent figures available from the Housing Service on housing need, homelessness and temporary accommodation. The SHMA has specific figures on Housing Need and affordability in Newham. The R19D states on P228 that "The Newham Strategic Housing Market Assessment (SHMA) 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". Simply multiplying these figures out will suggest to many readers a far lower requirement for SH at 36% than is actually required. These figures are in any event now out of date given the still rising tide of homeless acceptances in Newham. There will also be further information available from the 2021 Census about households in Newham which can be mapped onto homelessness and waiting list figures and household income figures to provide an updated estimate of need for the Plan and this should be done.		A change to this policy approach has not been made. We did not consider this change to be necessary as the plan's approach to affordable housing delivery is justified by a recently produced Strategic Housing Market Assessment undertaken using a robust methodology that has withstood scrutiny at Local Plan examinations. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-007	David Gilles		Reg19-E-007/016	Homes	H3 Affordable housing						Blank	Blank						Blank	13 Homes P218 on Generally: The 50% SH commitment is one that should be regarded as taking place over the life of a scheme. So it should take into account nominations that eg RP's and Developers of Housing for Rent and Populo might provide over the life of a scheme and also in kind (eg elsewhere) and not necessarily on a first letting. Thus as interest rates fall in the short/medium term it should be possible to increase the proportion of SH in a particular scheme. This would need to be tied up with an enforceable nominations agreement and some eg best endeavours clauses.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be positively prepared because developments will be subject to policy requirements around review mechanisms as set out in Local Plan Policy BFN4. Affordable housing delivery proposed by an application will be secured in perpetuity via a development's legal agreement. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/017	Homes	H3 Affordable housing						Blank	Blank						Blank	P218 para 1: Affordable should be replaced with "Social and Affordable" throughout the Plan.		This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared because it is clear that affordable housing includes social rent housing. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/019	Homes	H3 Affordable housing						Blank	Blank						Blank	P218 Para 3: The revised justification is welcome but not sufficient. The data should be updated to July 2024. The revised justification should include material from the SHMA on affordability and need together with updated figures on rental increases in the PRS since Covid, and the effects of the LHA and its levels combined with these rental increases. The SHMA should be presented as one but not the only source of data on need and affordability. Overall the revised justification of affordability and need should cover 2-3 pages and become the most significant part of the Plan when it is submitted for Inspection.		A change to this policy approach has not been made. We did not consider this change to be necessary as the plan's approach to affordable housing delivery is justified by a recently produced Strategic Housing Market Assessment undertaken using a robust methodology that has withstood scrutiny at Local Plan examinations. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/023	Homes	H3 Affordable housing						Blank	Blank						Blank	H3 Justification as a whole: This has been substantially rewritten and is much improved. However the SHMA text quoted in the justification (see above) can be interpreted as a need for only 36% Social Housing in Newham. This figure (even if correct) does not take account of the reality of Housing Need in Newham demonstrated by eg current homelessness and waiting list figures as well as the number of residents (eg living in the PRS) receiving Housing Support through a rent rebate/LHA scheme. These are the critical priorities for the Council and this crucial fact needs to be much more strongly brought out in the Justification.		A change to this policy approach has not been made. We did not consider this change to be necessary as the plan's approach to affordable housing delivery is justified by a recently produced Strategic Housing Market Assessment undertaken using a robust methodology that has withstood scrutiny at Local Plan examinations. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/024	Homes	H3 Affordable housing						Blank	Blank						Blank	H3 P227: "Social" and Affordable Housing		This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared because it is clear that affordable housing includes social rent housing. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-007	David Gilles		Reg19-E-007/025	Homes	H3 Affordable housing						Blank	Blank						Blank	H3 P227 on: Where the text is qualified delete all after "supported." In several places; eg the last part of H3: 1 on P227 which states "unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered" and H3: 2 c. which states "unless an application is accompanied by a detailed financial viability assessment, demonstrating that the maximum viable amount will be delivered."		This wording change is not supported. We did not consider this change to be necessary as, alongside ensuring the plan is positively prepared and justified, national policy requires us to demonstrate the plan is deliverable. Our viability evidence shows that is not possible in all circumstances to viably deliver our affordable housing target. Our approach to requiring viability assessments where policy targets cannot be met is therefore consistent with national policy, including planning practice guidance on deliverability. It is important in demonstrating the plan will be effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/026	Homes	H3 Affordable housing						Blank	Blank						Blank	H3 P227 on: Affordable Housing does not specify any particular density and only talks about houses, homes or units. However H3.1 on P228 says "Affordable housing targets are measured using the gross number of new units within a development." This should be changed to habitable rooms which would provide a greater ability to specify what are family/non family units according to the number of habitable rooms. It should also cross reference to the housing crisis in the Borough and theH3 Affordable Housing Justification more generally.		A change to this policy approach has not been made. We did not consider this change to be necessary as you achieve a greater proportion of family and affordable housing by using targets based on units rather than habitable rooms, thereby helping to ensure the policies are effective and positively prepared. Amendments to the implementation text to add further justification text would result in unnecessary repetition and confuse the purpose the separate policy justification and implementation sections of the policy. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-007	David Gilles		Reg19-E-007/027	Homes	H3 Affordable housing						Blank	Blank						Blank	H3.1 P229: Delete the last sentence. There is no acceptable trade off between family homes (where the R19D Consultation Report says in any event on P81 that "our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment") and smaller non family units. Any deficit in family homes should be justified in its own terms and not by linkage to viability and/or an increased number of studio/one bed flats either per se or to improve viability. This point should also be clarified in the text of H4.4 and H4.5 on P233.		With regards to family housing targets, a change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, including larger family-homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes. With regards to one bedroom targets, The Council's objective for this policy approach is to improve the viability of residential schemes. However, the Council recognises the importance of ensuring the Plan is justified by our identified need for one bedroom properties and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
Reg19-E-007	David Gilles		Reg19-E-007/029	Homes	H3 Affordable housing						Blank	Blank						Blank	Monitoring Framework for Housing P589 on: This is not yet wholly adequate and should be expanded to accord with comments already made above. Not only should we be monitoring applications, approvals and completions by tenure but		A change to this policy approach has not been made. We did not consider this change to be necessary as the proposed monitoring indicators for the policy are considered proportionate and would measure the effectiveness of planning policy. Reporting

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																			the figures and trends should regularly be reported (ie monthly) to SDC, Cabinet and Scrutiny. In turn this would allow overall outputs and outcomes such as changes in the rates of provision to be monitored. There should also be an increased number of variables about the Housing Crisis in Newham monitored as well; eg numbers of homeless applications and acceptances; numbers in TA; waiting list numbers, rent levels and affordability letting numbers and trends figures about the PRS and enforcement therein. Planning Officers should agree an appropriate list of indicators, all with outputs and outcomes, with the Director of Housing/his staff. It is particularly important that an accurate record of planning approvals by tenure, start on site data, completions, costs and associated letting data is kept by planning consent/scheme.		on an annual basis accords with Section 113 of the Localism Act 2011. In most instances updated data sources are only made available on an annual basis, and reporting more frequently than this would divert resources from ensuring effective implementation of these emerging policy requirements. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-014	CPRE		Reg19-E-014/003	Homes	H3 Affordable housing														The Council should prioritise the allocation of sites for affordable homes for Enfield [Newham?] residents on brownfield land.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-015	Greater London Authority		Reg19-E-015/005	Homes	H3 Affordable housing														However, it is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan for two reasons: [· firstly, the intention to alter the borough's housing targets prior to 2029 so that it is lower than the one established in the LP2021; and] · secondly the proposed approach to affordable housing. Further detail on these is provided in the subsequent sections of this letter.		Comment noted. Our response to this issue is set out fully in response to the relevant representations below.

Reg19-E-015	Greater London Authority		Reg19-E-015/009	Homes	H3 Affordable housing													Affordable housing The Mayor notes that the approach to affordable housing has changed since the Regulation 18 consultation. At that time, it was proposed to follow the Mayor's threshold approach at the levels set out in Policy H5 of the LP2021. The intention now is to apply the Mayor's threshold approach but to set the threshold at 60 per cent which is notably higher than the Mayor's strategic target of 50 per cent and the threshold is to be applied to all residential schemes of ten or more units. Within this, LBN's intention is to deliver 50 per cent of housing as social rented housing and 10 per cent as affordable home ownership. The proposed tenure split therefore works out as 83/17 in favour of social rent housing. Where residential proposals cannot meet these requirements, they will be viability tested. The thresholds set in Policy H5 of the LP2021 were informed by viability testing. For privately owned land, the 35 per cent threshold is set at a level that has proven effective at securing affordable housing. The 2022 Annual Monitoring Report [Footnote 3 - https://www.london.gov.uk/sites/default/files/2024-05/AMR19%202021_22%20%28final%29%20%281%29.pdf] illustrates that 84 per cent of all strategic applications provided at least 35 per cent affordable housing, representing an increase from 53 per cent of schemes in 2018. The average rate of affordable homes per scheme was 41 per cent of all units and 45 per cent of all habitable rooms. While the delivery of affordable housing in London is a key priority for the Mayor, we are very concerned that setting the threshold at 60 per cent would actually reduce the delivery of affordable homes in practice and would result in larger numbers of residential planning applications not being able to meet the threshold. Indeed, the Local Plan Viability Report [Footnoe 4 - file:///C:/Users/hassa/Documents/Work%20%20Related/Newham/Reg%2019/evidence/Newham_Local_Plan_Reg_19_viability_report.pdf], published as part of the evidence base, does not demonstrate that most sites or typologies tested would be deliverable with a 60 per cent affordable housing requirement. This would mean more proposals following the Viability Tested Route (VTR), which undermines the threshold approach, takes longer to determine planning applications when compared with Fast Track Route (FTR) schemes, and overall, provides less affordable housing. To illustrate this point, on average, schemes that were referrable to the Mayor that followed the FTR provided 44 per cent affordable housing in 2022, whereas viability tested schemes provided only 28 per cent. The approach would also result in a lack of certainty when acquiring		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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																			land due to the lack of consistency in affordable housing provision from site to site. Furthermore, applicants also typically seek to demonstrate the existence of 'viability deficits' through the viability assessment process and use these as a credit in viability review mechanisms which can reduce the likelihood that additional affordable housing is secured over the lifetime of the development. As such there is a significant risk that the borough would secure fewer affordable homes through the proposed blanket 60 per cent requirement than could be achieved through the 35 per cent and 50 per cent thresholds set out in the LP2021.		
Reg19-E-015	Greater London Authority		Reg19-E-015/010	Homes	H3 Affordable housing														We note that Policy H3 refers to review mechanisms set out in Policy BFN4, but these have not been set out in the draft Plan and their inclusion would be beneficial and useful.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach is effective. Policy BFN4.2 sets out the need to explore all available options (including review mechanisms, flexible trigger points or phased payment of contributions) to reduce the viability gap and secure much needed contributions. The policy's Evidence base list also refers to the Affordable Housing and Viability Supplementary Planning Guidance, which provides further guidance on formulating review mechanisms. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-015	Greater London Authority		Reg19-E-015/011	Homes	H3 Affordable housing														The proposed tenure split also diverges from LP2021 Policy H6 which makes it clear that the tenure requirement for affordable housing should be 30 per cent each for low cost rent and intermediate housing products and the remaining 40 per cent should be determined by boroughs. LBN's proposed approach does not meet these requirements by requiring an 83/17 split in favour of social rented housing. Again, this is likely to mean that relatively few residential applications will be able to meet these requirements resulting in even more schemes having to take the Viability Tested Route.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

Homes Comments to the [full Regulation 19 Representations]

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Reg19-E-015	Greater London Authority		Reg19-E-015/013	Homes	H3 Affordable housing														Overall, this divergence from the approach set out in LP2021 Policy H5 and Policy H6 is significant and for that reason it is the Mayor's opinion that the proposed approach to affordable housing is not in general conformity with the LP2021.		Comment noted. Our response to this issue is set out fully in response to the relevant representations above.
Reg19-E-019	Delia Taasin		Reg19-E-019/003	Homes	H3 Affordable housing														It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.		Support noted.

Reg19-E-024	Home Builders Federation		Reg19-E-024/026	Homes	H3 Affordable housing			1				No						H3: Affordable housing Part 1 is unsound because it is unviable. Consequently it is unjustified, ineffective and contrary to the London Plan. Part 1 requires that half of all homes on a residential scheme are provided as social rent and a further ten per cent of the total as affordable home ownership housing, therefore, 60 per cent affordable housing. See paragraph 3.181. The evidence indicates strongly that this is untenable. Naturally, we recognise the severe character of the housing crisis in London, but these problems cannot be resolved by extracting higher requirements from new residential development by way of compensation. More unviable schemes will result in fewer homes overall and therefore fewer affordable homes. This will make the problem much worse. One must turn to the London Borough of Newham: Local Plan Viability Assessment, April 2024. In the summary, the report observes: *The results do not point to any particular level of affordable housing that a majority of schemes can viably deliver but the results do indicate that there are some development circumstances in which the emerging policy target of 60% could be viable. However, given the extent of appraisal outputs which indicate schemes will be viable with lower affordable housing percentages, we recommend that the target be applied on a 'subject to viability' basis taking site-specific circumstances into account. This reflects the Council's current practice and also the 'viability tested' route in Policy H5 of the 2021 London Plan.* Also, this observation in paragraph 6.9 acknowledges the non-feasibility of the affordable housing target: *…the target is precisely that and not a quota that can be met by every development proposal. This will be particular important for the emerging 60% target as our testing indicates that fewer developments are viable with this percentage of affordable housing in comparison to 35% to 50% affordable housing.* This is sensible advice and the Council should follow it and adhere to the London Plan approach. Otherwise, subjecting probably every application for residential development to detailed scrutiny will constipate the system, delay delivery, adding to the difficulty of meeting the London Plan housing requirement. We refer the Council to the observations of the government in its London Plan Review: Report of Expert Advisers and the welter of policy that weighs against swift decision making (see paragraphs 3.37-3.38). Planning approvals for homes have fallen grievously low in the last three years, from 89,000 in 2018/19 down to 40,200 in 2022/23. The ley results to consider are not the tables that exclude infrastructure costs (tables 6.11.1 to 6.11.3) or lower percentages of affordable housing, but the tables that		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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																			reflect the cumulative impact of policies and 60 per cent affordable housing – see tables 6.60.4 to 6.60.4 (pages 63-65).		
Reg19-E-024	Home Builders Federation		Reg19-E-024/028	Homes	H3 Affordable housing			1				No							The policy for affordable housing seems counterproductive. It will prevent residential development across the borough, thereby reducing even further affordable housing supply and adding to the Council's financial woes, including mounting costs for temporary accommodation.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/034	Homes	H3 Affordable housing														Beckton Developments supports the Borough's desire to address affordable housing needs within Newham. We note that draft Policy H3 states ""residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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". As confirmed at paragraph 3.181, Newham seek to deliver 60 per cent of all new homes as affordable housing. London Plan Policy H4 (Delivering Affordable Housing) states the strategic target is for 50% of all new homes delivered across London to be genuinely affordable. We consider the requirement for schemes to deliver 60% affordable housing to be an inappropriate strategy for the Borough to be able to encourage and deliver appropriately optimised site. To date, the policy is not in line with current London Plan requirements. The policy as drafted discourages viable developments to come forward, thereby making the policy not deliverable and not effective		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-082	NHS Property Services		Reg19-E-082/006	Homes	H3 Affordable housing						Yes	Yes						Yes	Draft Policy H3 sets out the Council approach to affordable housing. If the Council intends to prepare any additional guidance to inform detailed delivery of this policy and as part of future Local Plan reviews, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff. Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council: • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Ensure that the local need for affordable housing for NHS staff is factored into future housing needs assessments, and any other relevant evidence base studies that inform the any future detailed guidance on the Local Plan or as part of future Local Plan reviews (for example employment or other economic policies). • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers. Whilst NHSPS considers Policy H3 to be sound as currently drafted, we would be grateful for consideration of the above in any additional guidance to inform detailed delivery of this policy and as part of future Local Plan reviews.	N/A NHSPS considers Policy H3 sound as currently drafted.	Support noted. Further discussion on this occurred during Duty to Cooperate discussions, and is outlined in the Statement of Common Ground with the NHS.

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Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/048	Homes	H3 Affordable housing														Comment: The importance of Affordable Housing is recognised, however the increase to 50% as social rented housing and 10 per cent of the total residential units as affordable ownership (60% total) within the R19 plan (up from 50% total as set out within the R18 plan), is above the London Plan target of 50% of all new homes across the capital.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/005	Homes	H3 Affordable housing						Blank	No						Blank	Affordable housing requirements exceed the London Plan and are shown to be higher than the evidenced viability in the Local Plan Viability Assessment, which will impact on the potential viability and deliverability of schemes that are needed to meet LBN's housing need;		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/023	Homes	H3 Affordable housing						Blank	No						Blank	The amendments to the thresholds for viability schemes and tenure mix are significant departures from the London Plan affordable housing policies (H4, H5 and H6) and are therefore unsound. The threshold set out in Part 1 of the policy to provide 60% of all housing units as affordable housing, with 50% of units in social rented tenure is a substantial increase on thee 35% affordable housing provision threshold (by habitable room) for the threshold approach in London Plan Policy H5. In addition to the targets being unsound, they will result in most housing schemes failing to meet the thresholds and following the viability route, particularly as the majority of housing allocations in the Local Plan are on brownfield sites with high upfront infrastructure costs, such as Stratford Cross. This will result in slower housing delivery against targets and housing need and particular in the context of higher build costs and interest rates. Therefore, the policy should be consistent with the London Plan policies, specifically the 35% threshold approach (London Plan Policy H5) and the tenure mix requirements (London Plan Policy H6). The new proposed 60% target is supported by a Local Plan Viability Study prepared by BNPP. The outputs of their report evidence that the 60% target is not deliverable on the majority of sites, this highlights that the target is too high and is not deliverable. Adopting a higher target than viably evidenced is inconsistent with the NPPG where Paragraph 002 states policy requirements, particularly for affordable housing, should be set at level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for a further viability assessment at the decision making stage. It is also considered that the site specific assessments have not been tested enough with key inputs missing or being incorrect e.g. site abnormal costs detailed build costs reflective of high density schemes. The outputs presented by BNPP are therefore not realistic outputs and are artificially inflating the viability of schemes. This further reinforces that the strategic target is not viable or deliverable. It is acknowledged that there is high demand for affordable housing and social housing in the borough. However, meeting this demand will need policies to be sound with the London Plan, allow flexibility in housing mix and to support optimising housing delivery and heights on highly accessible sites, such as those in Stratford Metropolitan Centre.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/010	Homes	H3 Affordable housing						Yes	No						Yes	Affordable Housing Policy H3 of the draft Local Plan notes that new residential development with the capacity for 10 or more homes should provide the percentage of affordable housing required through the threshold		Support noted. However, the affordable housing policy has been amended since the Regulation 18 version of the plan was published. We consider the proposed target in the Draft Submission Local Plan is positively prepared and justified. The target

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																			approach as set out within Policy H5 of the London Plan (2021). It is further noted that locally the tenure split should be 65% social rent housing and 35% intermediate homes. Bellway accepts this policy position, subject to viability testing to ensure delivery of housing is not unduly stifled.		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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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.

Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/017	Homes	H3 Affordable housing						Blank	No						Blank	[Appendix 2 - Representations Part 1] Part 1 seeks schemes to provide 60% of all housing units as affordable housing, with 50% of units in social rented tenure. This is a significant increase on the 35% affordable housing provision threshold (by habitable room) for the Fast Track route in London Plan Policy H5. As such, the thresholds for viability schemes and tenure mix are not consistent with the London Plan and aremtherefore unsound. Applying these challenging targets will place significant viability pressures on schemes particularly those on brownfield sites with high upfront infrastructure and build costs and complex site constraints like those in East Village. This could result in slower housing delivery which would goes against the government's target to increase housing supply. The BNPP Viability Study supporting the draft local plan tests a range of site typologies/scenarios, all excluding infrastructure costs. This exclusion is clearly unrealistic for major developments to be able to contribute significantly to local housing delivery. The study therefore over-states the level of affordable homes which are viable. Notwithstanding the above, the BNPP study also clearly demonstrates that the proposed requirement for 60% affordable homes is unviable. For Build to Rent schemes only 69 (16%) of the 426 typologies tested are viable including 60% affordable homes. This number will, in reality, be substantially less when infrastructure is accounted for, meaning that under 10% of schemes will be able to viably deliver the policy. Adopting a policy requirement which is so substantially out of step with the viability evidence is contrary to planning practice guidance which notes that (Reference ID: 10-002-20190509): The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers. Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage."	GL therefore recommend the policy is amended to reflect the 35% threshold approach for affordable housing (Policy H5) and the tenure mix requirements (Policy H6). Allowing flexibility on housing mix will in turn help optimise housing delivery on highly accessible sites, such as those in East Village Local Centre.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-164	Canning Town Development Company Ltd	DP9	Reg19-E-164/007	Homes	H3 Affordable housing							No							**Other Draft Policies** Whilst we fully appreciate the extent of LBN's housing challenges and support the aspiration to address this, we have a number of concerns regarding the approach to affordable housing and dwelling mix in		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target seeks to meet identified need for social rent homes, the

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																			the Draft Local Plan, as follows. Draft Policy H3 sets out the Council's approach to securing affordable housing delivery. Whereas the Regulation 18 draft Local Plan Policy was aligned to the London Plan requirements for affordable housing delivery, the Regulation 19 draft Local Plan introduces a requirement for 60% affordable housing by unit, comprised of 50% low cost rent and 10% shared ownership. Although it is acknowledged that the ability to meet the requirement can be viability tested, it is considered that this move away from the London Plan is detached from the reality of housing delivery in the current environment, where housing completions in London have reduced on account of viability, attributable to a range of factors. The discrepancy between the use of habitable rooms as a measure in the London Plan and units in the Regulation 19 draft Local Plan repeats an unhelpful misalignment that exists between current policies, undoing the alignment sought in the Regulation 18 draft Local Plan. The BNPP Study which supports the draft plan indicates that this change would negatively impact on scheme viability. It could therefore risk reducing the total number of affordable homes that can be delivered over the plan period contrary to the objectives of the plan. Further, the Officer report to Newham's Cabinet Meeting held on 4th June stated that the affordable housing policy changes made following the full Council motion in December 2023 may cause deliverability challenges. This is because of the impact it could have on the Plan's viability. Officers were concerned that if it was to be submitted to an inspector for examination that it will be challenged and found to be unsound. We echo these concerns and request that the wording of this policy is reverted to that in the Regulation 18 draft Local Plan, to be in general conformity with the London Plan.		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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. In terms of using units rather than habitable rooms to measure the target, schemes can achieve a greater proportion of family and affordable housing by using targets based on units rather than habitable rooms, thereby helping to ensure the policies are effective and positively prepared. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-169	Silvertown Homes Ltd	DP9	Reg19-E-169/008	Homes	H3 Affordable housing						Blank	No						Blank	Policy H3 'Affordable Housing' & Policy H4 'Housing Unit Mix' To meet Newham's policy priority to deliver more social rented homes policy H3 'Affordable Housing' requires residential developments on sites with the capacity to deliver ten dwellinghouses (C3) or more should 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. Developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4.2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. Draft Policy H3 of the Newham Regulation Draft Local Plan would fail to comply with the London Plan (Policy H5) which sets the threshold level of affordable housing on gross residential development at 1) a minimum of 35 per cent; or 2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or 3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and NonDesignated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity. To follow the Fast Track Route applications must meet the relevant criteria set by Policy H5(C). The London Plan also requires affordable housing to be provided as a percentage of the total number of habitable rooms or habitable floorspace, whereas draft Policy H3 seeks provision based on the number of units. In addition to the misalignment with the London Plan we are concerned that the revised approach to affordable housing will impact on plan viability and the delivery of development in the borough. Given the impact on viability we would challenge whether the approach would meet the 'effective' test oundness. We note that the possible issues relating to the soundness of the plan in relation to affordable housing were noted at the Newham Council June 2024 Cabinet meeting.	The Council should amend Draft Policy H3 to require a minimum provision of 35% affordable housing based on the total number of habitable rooms, or 50% when development relates to public land or industrial land, in accordance with Policy H5 of the London Plan. The Council should also reconsider the split between social/affordable rent and intermediate products. In accordance with Policy H6 of the London Plan a minimum of 30% of the affordable housing should be provided as social/affordable rent, 30% as intermediate with the remaining 40% to be determined by the borough based on identified needs.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-169	Silvertown Homes Ltd	DP9	Reg19-E-169/012	Homes	H3 Affordable housing						Blank	No						Blank	The Councils affordable housing (H3) [and unit size mix (H4)] polices should also be reconsidered and amended to align with the London Plan and ensure that development is viable, and capable of supporting and delivering the maximum viable number of homes.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/029	Homes	H3 Affordable housing			2			No	No						Blank	Draft Policy H3 (Affordable Housing) Berkeley Homes supports the Borough's desire to address affordable housing needs within Newham. We note that draft Policy H3 states "residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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". As confirmed at paragraph 3.181, Newham seek to deliver 60 per cent of all new homes as affordable housing. We note the inclusion that the target be applied on a 'subject to viability' basis taking site-specific circumstances into account. This reflects the Council's current practice and also the 'viability tested' route in Policy H5 of the 2021 London Plan. Notwithstanding this, Berkeley Homes raises concerns within regard to conformity with London Plan Policy H4 and lack of clear evidence within the published evidence base to fully support this policy. London Plan Policy H4 (Delivering Affordable Housing) states the strategic target is for 50% of all new homes delivered across London to be genuinely affordable. The policy is not in line with current London Plan requirements. We therefore consider this policy to be inconsistent.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/030	Homes	H3 Affordable housing														[Draft Policy H3 (Affordable Housing)] Furthermore, we note that within the Local Plan Viability Assessment, BNP Paribas found that 'the results do not point to any particular level of affordable housing that a majority of schemes can viably deliver but the results do indicate that there are some development circumstances in which the emerging policy target of 60% could be viable.' Additionally, the assessment states that at 60% affordable housing, 'testing indicates that fewer developments are viable with this percentage of affordable housing in comparison to 35% to 50% affordable housing.' Whilst we understand that the policy is intended to ensure the maximum number of affordable homes are capable of being delivered, there is little evidence to suggest that a 60% target will ensure a greater number of homes. In turn, we highlight concerns that a strategic 60% target will fetter development with developers unable to deliver a viable scheme. Additionally, the evidence base also demonstrates that sites that deliver additional benefits such as community infrastructure or transport infrastructure, a significant proportion of the value generated by private housing will be used to cross-subsidise this infrastructure, limiting the amount of value available to provide affordable housing. As set out in the evidence base, only 'some' schemes will be able to deliver 60% affordable housing. This means that the vast majority of applications will be subject to viability. In our experience, these viability negotiations are typically lengthy for both the developer and local authority, creating additional cost, risk and uncertainty. In turn, there is a concern that this could result in developers looking elsewhere instead of investing in Newham, ultimately hampering the ambitions the borough has for a 'fairer, healthier and happier' place for its residents. We therefore consider that the 60% strategic target will adversely impact the delivery of new development within the borough whilst increasing uncertainty, unaffordability, reducing community and transport commitments, reducing build quality and sustainability commitments, and also suppressing economic growth.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/031	Homes	H3 Affordable housing						Blank	No						Blank	[Draft Policy H3 (Affordable Housing)] Fundamentally, it is considered that the conclusions regarding affordable housing delivery are made without reasonable justification and evidence as required under the PPG, which states that Local Plans should be positively prepared and supported by appropriate, substantiated evidence. We consider that the Council has at this stage not published a sufficient level of analysis and there is an insufficient information base from which to effectively engage with the consultation process. The policy as drafted discourages viable developments to come forward, thereby making the policy not deliverable and not effective.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-173	L&Q		Reg19-E-173/012	Homes	H3 Affordable housing			H3.1											The draft Policy H3.1 requirements are very onerous and challenging, particularly when we are replacing housing in poor condition while delivering a policy-compliant mix to the uplift of any estate regeneration proposals, recognising the contribution that such schemes make to Newham's broader policy objectives to improve housing quality across the borough. The proposed mix of new homes should also be seen in the wider context of creating sustainable communities, with consideration should be given to the surrounding tenures.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-173	L&Q		Reg19-E-173/013	Homes	H3 Affordable housing														Additionally, we raise concern that the draft policy does not conform to the London Plan (2021). Specifically, the policy requires all major residential developments to provide 60% affordable housing overall, subject to viability. In our view, this comprises a conflict with London Plan Policy H5, which sets out the threshold approach to applications in which case viability testing would not be required (the 'fast track route', which includes at part B, a requirement for a minimum of 35% affordable homes to be provided in most instances)		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-173	L&Q		Reg19-E-173/014	Homes	H3 Affordable housing														In addition, of the draft 60% affordable housing requirement, the proposal is that 50% would be required for social rented housing and 10% as 'affordable home ownership housing'. Firstly, it is highlighted that on this basis, the affordable housing split would be 83% social rent and 17% intermediate tenure. This would represent a clear conflict with Policy H6.A(2) of the London Plan, which requires a minimum 30% of affordable homes to be provided as intermediate tenure. Under London Plan Policy H6.A, a maximum 70% of affordable homes can be required for social rented housing.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-173	L&Q		Reg19-E-173/015	Homes	H3 Affordable housing			H3.1											Secondly, draft Policy H3.1 appears to require all affordable housing other than social rented properties (i.e. intermediate tenure) to be provided as 'affordable home ownership'. This would also represent a clear conflict with Policy H6.A(2) of the London Plan, which indicates that the minimum 30% should be applied to any intermediate product, for instance including London Living Rent. Whilst paragraph 4.6.5 of the London Plan states that London Living Rent can be considered as an affordable homeownership product, it is typically viewed as a rental product, and so there is considered to be some ambiguity in draft Policy H3.1 referring to 'affordable home ownership housing'. For clarity, it is considered that the policy should refer simply to 'intermediate tenures'.		The Council's objective for this policy approach is to comply with the requirements of the 2023 National Planning Policy Framework (NPPF), which required at least 10% of the total number of homes in major housing developments to be available for affordable home ownership. However, the Council recognises the importance of ensuring the Plan is effective and able to respond to changes to requirements for different affordable housing products (for example, the changes to this requirement under the NPPF 2024). We therefore propose to support the following modification, which will be presented to the Inspector for their consideration: 1. Newham's policy priority is the provision of more social rent homes. Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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~~ **intermediate** housing. Developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4.2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.
Reg19-E-173	L&Q		Reg19-E-173/016	Homes	H3 Affordable housing			H3.1												Suggested amended wording: 1. 'Newham's policy priority is the provision of more social rent homes. Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) ~~or more should~~ **are encouraged to optimise the potential for affordable homes on site. Of the affordable homes provided,** ~~50~~ **70** per cent ~~of the total residential units~~ **should be provided** as social rent housing and ~~10~~ 30 per cent ~~of the total residential units~~ as ~~affordable home ownership housing~~ **intermediate tenures**. Developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4.2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered"	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-174	Daniel Blaney		Reg19-E-174/002	Homes	H3 Affordable housing														The urgent need for more genuinely affordable housing The government is continuing to consult on changes to the National Planning Policy Framework. It is perverse to close this consultation on ensuring the new stage of the Local Plan Review process is legally watertight while the government is consulting on changes to national policy, in particular the following: "We expect that many areas will give priority to Social Rent in the affordable housing mix they seek, in line with their local needs, and this is something we strongly support, but we will not be prescriptive; it is for local leaders to determine the balance that meets the needs of their communities." This is enormously helpful to the London Borough of Newham which already states that it seeks to give to priority to Social Rent in its Regulation 19 draft plan. However, the evidence to support that may need to be measured differently to aide the stated justification of the policy - see "Chapter 4 – A new Standard Method for assessing housing needs" of the NPPF consultation, still live. Once the national consultation has closed and assuming the new government's projection of urgency in this area is reflected in the speed of further policy announcements, it may be that the draft Newham Local Plan will punch below its weight on the issue of Social Rent before it is even adopted, having followed an outdated methodology for assessing housing need.	The Local Plan should be amended to the benefit of the local and national priority now given to Social Rent, to ensure it is technically accurate at the time of adoption. In the circumstances, the timing of this Regulation 19 consultation is perverse, and the local process should be paused pending elaboration of the timing of the new Government's policy approach. This is the best option for maximising homes for Social Rent, and compliance with the national legal framework.	The National Planning Policy Framework (NPPF) (2024) sets out transitional arrangements for the purposes of plan-making. As the plan has reached Regulation 19 stage before 12 March 2025, and our draft housing requirement is over 80% of local housing need, it is legally compliant for the plan to progress under the previous version of the framework. Irrespective of the new NPPF wording, our methodology for calculating housing need included looking at the specific need to deliver social rent homes in Newham, and this methodology has not been contested in response to the Local Plan. The new NPPF requirements do not alter the need to demonstrate that the plan is deliverable, which is where we have received the most significant critiques of the amended policy target. While we consider the policy position is sound, being examined under the new NPPF would not substantially change how this policy would be reviewed. Reconsidering the plan under the new NPPF would cause significant delays to the plan making process, delaying the implementation of the multiple benefits this new plan will have for our residents.

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Reg19-E-178	Royal Docks		Reg19-E-178/002	Homes	H3 Affordable housing						Blank	Blank						Blank	The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft. However, there are a number of strategic points which we wish to make so I have summarised these below for ease: <u>Affordable Housing</u> The new strategic target of 50% social rented homes and a further 10% of affordable home ownership is ambitious. In our view and experience, such a level of affordable housing is not viable on any of the GLAP sites that we are responsible for, nor in our view across any sites in the Royal Docks & Beckton Opportunity Area. Whilst it is for the Council to determine what it considers viable and deliverable in the borough, it should recognise that the Affordable Housing Policy (H3) will likely result in all strategic sites following the viability testing route. As a consequence, the process for testing viability must be adequately resourced to ensure that there are no delays to strategic site delivery. The Plan should acknowledge this reality, for example, in policy BFN4:2 which states that viability testing will be in "exceptional circumstances" rather than being the default scenario. There is also a broader point, which is that in promoting the Plan with this policy included (without an acknowledgment that the policy is purely aspirational), there is a risk that it creates the perception in the development community that the Council does not fully appreciate the reality of the housing market or viability in general.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by both our strategic housing market assessment (SHMA) and the fact that Newham has the highest number of residents in temporary accommodation in the country, which has been continually increasing since the publication of the SHMA. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-178	Royal Docks		Reg19-E-178/036	Homes	H3 Affordable housing						Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.] <u>Detailed Comments Schedule:</u> See comments above relating to the percentages sought by the policy.		Comment noted. Please see the Council's responses to the aforementioned comments.

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Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/010	Homes	H3 Affordable housing						Blank	Blank						Blank	[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] H3: Affordable housing - We are concerned that developers can too easily evade social rent housing requirements by using financial viability assessments that prioritise their profits. The housing emergency in this borough is too severe for weak policies—social rent housing provisions must be non-negotiable. Payments in lieu are unacceptable; if developers can afford to pay in lieu, they can afford to provide social rent housing.	[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] H3: Affordable housing - We believe that there should be a minimum of 50% social rent accommodation on the site. This should not count council-rent housing if it exited on the site prior to redevelopment - this should be provided in it's own right as part of a like-for-like policy. [...] - Policy should provide for a minimum number of family-sized social rent units (40% of SR units on site should be family sized).	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan to be suitably justified to meet objectively assessed need and ensure deliverability. Local Plan Policy H3 prioritises the delivery of social rent homes, requiring that residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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. Policy H4 also sets targets for individual sites with the capacity to deliver ten dwellinghouses (C3) or more to deliver 40 per cent of the number of new residential units as family dwellinghouses (C3) with three or more bedrooms. Policy H2 also requires that developments that result in the conversion or demolition of affordable housing should not be permitted unless replaced by an equivalent level of affordable housing floorspace. Affordable housing that is replacing social rent housing floorspace should be re-provided as social rent floorspace. As well as ensuring the plan is positively prepared and justified, national policy requires us to demonstrate the plan is deliverable. Our viability evidence shows that is not possible in all circumstances to viably deliver our affordable housing and family housing targets. Our approach to requiring viability assessments where policy targets cannot be met is therefore consistent with national policy, including planning practice guidance on deliverability. It is important in demonstrating the plan will be effective and deliverable. Payments in lieu will only be acceptable in exceptional circumstances, where on- or off-site affordable housing delivery is inappropriate or undeliverable. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/15	Homes	H3 Affordable housing														6. Other Draft Policies Whilst we fully appreciate the extent of LBN's housing challenges and support the aspiration to address this, we have a number of concerns regarding the approach to affordable housing and dwelling mix in the Draft Local Plan, as follows. Draft Policy H3 sets out the Council's approach to securing affordable housing delivery. Whereas the Regulation 18 draft Local Plan Policy was aligned to the London Plan requirements for affordable housing delivery, the Regulation 19 draft Local Plan introduces a requirement for 60% affordable housing by unit, comprised of 50% low cost rent and 10% shared ownership. Although it is acknowledged that the ability to meet the requirement can be viability tested, it is considered that this move away from the London Plan is detached from the reality of housing delivery in the current environment, where planning applications, scheme implementation and housing completions in London have reduced dramatically on account of viability, attributable to a range of factors. Whilst we appreciate the need for low cost rent in LBN and the reasons for prioritising it, the viability implications of doing so will need to be reflected in the overall percentage of affordable housing sought. The discrepancy between the use of habitable rooms as a measure in the London Plan and units in the Regulation 19 draft Local Plan repeats an unhelpful misalignment that exists between current policies, undoing the alignment sought in the Regulation 18 draft Local Plan. The BNPP Study which supports the draft plan indicates that this change would negatively impact on scheme viability. It could therefore risk reducing the total number of affordable homes that can be delivered over the plan period contrary to the objectives of the plan. Using unit numbers as a metric also discourages developers from bringing forwards much needed family homes in the affordable tenures, which they current get 'credit' for through the use of the habitable room metric. Further, the Officer report to Newham's Cabinet Meeting held on 4th June stated that the affordable housing policy changes made following the full Council motion in December 2023 may cause deliverability challenges. This is because of the impact it could have on the Plan's viability. Officers were concerned that if it was to be submitted to an inspector for examination that it will be challenged and found to be unsound.	We echo these concerns and request that the wording of this policy is reverted to that in the Regulation 18 draft Local Plan, to be in general conformity with the London Plan.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/016	Homes	H3 Affordable housing														Policy H3: Affordable housing Hadley recognises the need to provide affordable housing in the borough that supports the needs of Newham's residents. Hadley strongly supports the use of the threshold approach as set out in the London Plan in determining the level of affordable housing required for a site. However, the proposed requirement for sites to provide 50% of the total residential units as social rent and 10% as affordable home ownership might not always be the most appropriate mix for all sites in the Borough. The proposed mix of affordable housing tenure in any development proposal also needs to reflect the GLA affordable housing grant funding programmes, providing flexibility to ensure that homes are to be feasibly delivered. Therefore, Hadley suggests incorporating greater flexibility in the policy to allow for market demand changes and a greater chance of developments being able to deliver affordable housing. Flexibility of tenure mix should be granted to all schemes that can demonstrate the socio-economic and viability rationale for proposing an alternative tenure mix, particularly if that allows the provision of a size mix that fulfils identified needs.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-186	Muse	Longboard Consulting	Reg19-E-186/001	Homes	H3 Affordable housing							No							Newham's Draft Submission Local Plan (Regulation 19) June 2024 Policy H3 states that residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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. The associated policy Justification and Implementation refer to "the pressing need to deliver genuinely affordable homes to meet both Newham and London's wider housing needs; that "genuinely affordable housing" is to be delivered on land in public ownership and that "genuinely affordable housing should be included within the initial buildings or phases of developments." 'Genuinely affordable' housing is used elsewhere in the Draft Submission Local Plan (Regulation 19) but is not a defined term.London Plan (2021) Policy H6 (Affordable housing tenure) affordable products and para. 4.6.3 states: "The Mayor is committed to delivering genuinely affordable housing. Within the broad definition of affordable housing, the Mayor's preferred affordable housing tenures are: • homes based on social rent levels, including Social Rent and London Affordable Rent* • London Living Rent • London Shared Ownership" [* Whilst the GLA no longer publishes London Affordable Rent levels this may be restored in the future and rent levels between Social Rent and London Living Rent should form part of the affordable housing tenure offer]		The Council's objective for this policy approach is to deliver genuinely affordable homes that meet the needs of our residents. However, the Council recognises the importance of ensuring the Plan is effective and has therefore made the following wording change which is included in the modification table: [Glossary] **Genuinely affordable housing: As per the Mayor of London's preferred affordable housing tenures in the London Plan (2021), genuinely affordable homes are:** **• homes based on social rent levels, including Social Rent and London Affordable Rent** **• London Living Rent; and** **• London Shared Ownership.**
Reg19-E-186	Muse	Longboard Consulting	Reg19-E-186/003	Homes	H3 Affordable housing							No							The Glossary to the Draft Local Plan (Appendix 1) defines 'Affordable Housing' as "Social rent, London affordable rent, affordable rent and intermediate housing …" As drafted the Draft Submission Local Plan (Regulation 19) is internally inconsistent and not in conformity with the London Plan.		The Council's objective for this policy approach is to deliver genuinely affordable homes that meet the needs of our residents. However, the Council recognises the importance of ensuring the Plan is effective and has therefore made the following wording change which is included in the modification table: [Glossary] **Genuinely affordable housing: As per the Mayor of London's preferred affordable housing tenures in the London Plan (2021), genuinely affordable homes are:** **• homes based on social rent levels, including Social Rent and London Affordable Rent** **• London Living Rent; and** **• London Shared Ownership.**

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Reg19-E-186	Muse	Longboard Consulting	Reg19-E-186/004	Homes	H3 Affordable housing							No							The representations are matters of interpretation rather than factual errors. Unless the Council makes amendments to reflect representations it is appropriate that the Policies, Justification and Implementation are discussed in a public forum	1. Amend Policy H3 to reflect housing need identified in the SHMA."Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should provide 50 per cent of the total residential units as affordable homes as social rent housing and 10 per cent of the total residential units as affordable home ownership housing comprising 62% Social Rent, 22% London Living Rent and 16% Intermediate/Affordable Home Ownership."	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by both our strategic housing market assessment (SHMA) and the fact that Newham has the highest number of residents in temporary accommodation in the country, which has been continually increasing since the publication of the SHMA. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-186	Muse	Longboard Consulting	Reg19-E-186/005	Homes	H3 Affordable housing							No							Newham's Draft Submission Local Plan (Regulation 19) June 2024 Policy H3 states that residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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. [emphasis added]The SHMA (Figure 6, 48 and elsewhere) sets out affordable housing need based on different tenures. There is an identified need for London Living Rent/Intermediate/Shared Ownership/Affordable Rent homes which together amount to approximately 38% of the total affordable housing need (SHMA Figure 6). Policy H3 specifies 10% 'affordable home ownership' and then only in addition to 50% social rent.	Amend Policy H3 to identify the need for other affordable tenures."Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should provide 50 per cent of the total residential units as affordable homes as social rent housing and 10 per cent of the total residential units as affordable home ownership housing comprising 62% Social Rent, 22% London Living Rent and 16% Intermediate/Affordable Home Ownership."	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by both our strategic housing market assessment (SHMA) and the fact that Newham has the highest number of residents in temporary accommodation in the country, which has been continually increasing since the publication of the SHMA. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-186	Muse	Longboard Consulting	Reg19-E-186/006	Homes	H3 Affordable housing							No							Newham's Draft Submission Local Plan (Regulation 19) June 2024 Policy H3 states that residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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. Policy H3 goes on to state that developments that do not meet the requirements (and the delivery of the required level of family dwellinghouses under Local Plan Policy H4.2) will be subject to viability testing.The SHMA (Figure 19) and the BNPP London Borough of Newham: Local Plan Viability Assessment, April 2024 (Table 4.6.1 and 4.7.1) highlight the significant difference in rental levels and capital values between Social Rent and London Living Rent.Delivering 50% social rent housing is highly unlikely to be achievable on sites not in public ownership. As a consequence almost all applications for more than 10 dwellinghouses will be subject to viability testing. This is an additional time and cost burden on applications and will slow down decision-making and the delivery of new homes.	Amend Policy H3 to allow for the delivery of a wider range of affordable housing tenures within an overall target of 50%."Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should provide 50 per cent of the total residential units as affordable homes as social rent housing and 10 per cent of the total residential units as affordable home ownership housing comprising 62% Social Rent, 22% London Living Rent and 16% Intermediate/Affordable Home Ownership."	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by both our strategic housing market assessment (SHMA) and the fact that Newham has the highest number of residents in temporary accommodation in the country, which has been continually increasing since the publication of the SHMA. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-189	London Square Ltd	DP9	Reg19-E-189/007	Homes	H3 Affordable housing						Yes	No						Yes	Newham faces significant housing challenges, and we are fully supportive of the aspirations to address them. However, we have several concerns regarding the approach to affordable housing and dwelling mix in the Draft Local Plan. Draft Policy H3 sets out the LBN's approach to securing affordable housing delivery. We supported the Regulation 18 draft Local Plan Policy as this was aligned to the London Plan requirements for affordable housing delivery. However, we do not support the Regulation 19 wording, as this introduces a requirement for 60% affordable housing by unit, comprised of 50% low-cost rent and 10% shared ownership. We acknowledge that ability to meet the requirement can be viability tested, however, this moves away from the London Plan approach and is detached from the reality of housing delivery in the current environment, where housing completions in London have reduced on account of viability, attributable to a range of factors. Furthermore, the Regulation 18 draft Local Plan aligned with the London Plan by assessing affordable housing requirements according to habitable rooms, whereas the Regulation 19 now uses habitable units as a measurement. This is in conflict with the London Plan policy, as such, it is suggested that this is reverted to using habitable room (opposed to habitable unit) for the assessment of affordable housing. The BNPP Study which supports the draft plan indicates that this change would negatively impact on scheme viability. It could therefore risk reducing the total number of affordable homes that can be delivered over the plan period contrary to the objectives of the plan. Further, the Officer report to Newham's Cabinet Meeting held on 4th June stated that the affordable housing policy changes made following the full Council motion in December 2023 may cause deliverability challenges. This is because of the impact it could have on the Plan's viability. Officers were concerned that if it was to be submitted to an inspector for examination that it will be challenged and found to be unsound. We echo these concerns and request that the wording of this policy is reverted to that in the Regulation 18 draft Local Plan, to be in general conformity with the London Plan.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/045	Homes	H3 Affordable housing							No						Policy H3 Affordable housing (and Policy H5 Build to Rent housing) 8.9 St William notes that LBN have proposed a significant change to its affordable housing requirements which are set out in Policy H3. There are two key changes from the Regulation 18 consultation draft: 1) greater emphasis or priority given to social rent homes and 2) a new requirements for 50% of the total residential units as social rent housing and 10% of the total residential units as affordable home ownership housing equating to an overall requirement for 60% of residential units to be provided as affordable homes on each development site. 8.10 The policy notes that developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under draft Local Plan Policy H4.2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. Furthermore, reference to the fast track route (or threshold approach as set out in the London Plan has been removed from this policy. 8.11 Whilst St William acknowledges the greater emphasis on the provision of social rent homes and acknowledges that this is in line with recent proposed amendments to the NPPF, the policy as now proposed does not align with London Plan Policy H5 'Threshold approach to applications', Footnote 59 nor is it supported by a robust viability evidence base o. As part of the evidence base to support the Regulation 19 Local Plan, BNPP have prepared a Local Plan Viability Assessment (April 2024), this tests the financial impact of the increased target to 60% amongst other policy requirements for tenure, design, sustainability and s106 contributions. The conclusions of the viability report evidence that the 60% target is not viable, and a number of sites are not viable at lower percentages once other policy requirements are included. This evidences that the 60% target is not viable or deliverable, therefore all schemes would need to follow the viability tested route. This is considered to be contrary to planning practice guidance (Reference ID: 23b-005-201903315) and the NPPF Paragraph 31 and Paragraph 58 as the viability is not proportionate and undermines the deliverability of the plan. 8.12 This was also raised by Officers at Newham's Cabinet Meeting (4th June 2024). The Officers Report to Cabinet Plan for Newham states in paragraph 3.5 "The affordable housing policy changes made following the Full Council motion in December 2023 may cause deliverability challenges for the Local Plan due to the impact on the Plan viability." 8.13 Viability challenges will have a significant impact on delivery, which are already at a low level. Further challenges will only exacerbate the existing low deliverability rates, resulting in even fewer affordable homes. In London, over the 2019/23 period, in 2023/24 total housing starts were 39% against the average starts	[Appendix 12: General Policies – Suggested amendments] 1. Newham's policy priority is the provision of more social rent homes. Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should provide: a. **the percentage of affordable housing required through the threshold approach as set out within Policy H5 of the London Plan (2021).** ~~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.~~ b. **an affordable housing tenure mix of 70 per cent social rent housing and 30 per cent intermediate homes.** Developments that do not meet these requirements ~~and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4.2~~ will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 2. New residential developments with the capacity to deliver ten dwellinghouses (C3) or more should provide affordable housing on site. Where the Council considers that on site provision is inappropriate or undeliverable due to site conditions or the scale of the site, the applicant should: a. prioritise off site provision of affordable housing with the equivalent quantity, tenure and size mix required under part 1; or b. where off site provision of affordable housing is not deliverable, a payment in lieu of affordable housing may be accepted. The payment in lieu should result in the ability to secure a higher level of affordable housing provision than the ~~60 per cent strategic~~ target sought by part 1 above; and c. where applicants are proposing to not meet the requirements of parts 2.a or 2.b, this will not be supported unless an application is accompanied by a detailed financial viability assessment, demonstrating that the maximum viable amount will be delivered.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

																		over this five year period period, and affordable housing starts were 42% against the average starts over this five year period. In Newham, total housing starts in 2023/24 were 27% against the average, and affordable housing starts were 40% against the average. This data from the GLA clearly illustrates that housebuilders are struggling to meet the 35% affordable housing threshold. 8.14 The approach set out by LBN is inconsistent with the London Plan where a lower threshold is set to incentivise developers to come forward. Whilst it is acknowledged that there remains an aspiration to deliver 60% affordable housing and this can be a target, a lower fast track threshold of 35% should be included to ensure consistency with the London Plan and incentivise sites to come forward with certainty on the affordable housing offer, avoiding the need for detailed negotiations on viability. The acute need for affordable housing in LBN has to be balanced with the need to deliver other social infrastructure in addition to a realistic understanding of what development can deliver in the current market, and a policy approach that does not compromise sustainable development. With the target set too high limited sites will not come forward given the significant viability constraints, and having to progress through the viability tested route will create further uncertainty, detract investment into the Borough and delays to the process. Development brings forward a significant expanse of public benefit beyond affordable housing, such as open space and jobs; policy that thwarts development will leave these benefits unrealised. 8.15 Policy H5 of the London Plan sets a lower minimum requirement of 35% affordable housing or 50% for public sector land and industrial locations (with the exception of gasholder sites) as the threshold for the Fast Track Route where a financial viability appraisal is not required as long as the above threshold is met or exceeded, the proposed tenure split is consistent with the tenure split outlined in Policy H6 of the London Plan and other relevant policy requirements and obligations have been met. 8.16 The proposed tenure mix set out by LBN seeks to provide 50% social rent and 10% intermediate, this is supported by a Strategic Housing Market Assessment evidencing current housing needs in the borough. Whilst it is accepted that there is a need to deliver more social housing across London, the requirement for 50% social rent is not viable or deliverable, as evidenced in the Council's own viability study. 8.17 The tenure mix therefore needs to be adjusted to take into account a reduced overall target, as an example where a 35% threshold is applied, using the same proportion of social rent / intermediate (83/17), this would equate to 29% social rent and 6% intermediate. Whilst the aspiration for 50% social rent can remain, a lower threshold needs to be set to ensure schemes can progress through the fast track route, to ensure consistency with the London Plan.		

Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/048	Homes	H3 Affordable housing							No						8.19 The London Plan in particular acknowledges the strategic role of gasworks sites in the delivery of housing but also for the exceptional abnormal costs associated with bringing forward these sites for development. Footnote 59 of the London Plan applies the 35% Fast Track threshold to former utility sites instead of the 50% threshold that would be applied if these sites were treated as industrial sites and not acknowledged for their unique characteristics. 8.20 LBN's Local Plan Viability Assessment (Regulation 19) 2024 evidence base document (and draft Policy H3 of the Regulation 19 Local Plan) fails to acknowledge the exceptional abnormal costs associated with gasworks sites. Paragraph 4.39 of the Local Plan Viability Study states that exceptional costs have not been included, for formal gasworks as evidenced at Bromley by Bow these costs are significant, it is considered that this detail needs to be included within the Site Specific sites tested. Excluding exceptional costs on site specific allocations where abnormal costs are known, is presenting a viable outcome that is incorrect and artificial, inflating the viable amount of affordable housing that can be provided on these sites. 8.21 We have genuine concerns regarding LBNs Local Plan Viability Assessment. It does not consider the Bromley by Bow site and it is unclear why this has been excluded. It is a strategic site, presents the opportunity for a significant number of homes and jobs and is an allocated site for the borough. NPPG suggests that these are very much the sites that should be assessed. We are also concerned about the credibility of the inputs, and outputs derived from the whole plan viability assessment. Notably the build costs do not reflect realistic and predictable costs, and there is an over reliance on BCIS. For buildings of above 6 storeys an additional cost for height needs to added on. It is am omission to exclude taller buildings. It is also unrealistic for buildings to be built with a psf rate of less than £300psf (taking account of all additional policy requirements). This is not reflective of current market conditions. The finance rate of 6% does not reflect current market conditions and there is limited commentary on profit, with no reference to commercial profit, or where it is appropriate to consider alternative measures like IRR. The assumptions regarding s.106 contributions are fundamentally different from those sought by LBN via the development management process. For the Bromley By Bow site, a Financial Viability Appraisal has been undertaken, assessed by the same authors as the Local Plan Viability Assessment. This concludes 10% affordable housing for the site, fundamentally a different output to the Local Plan Assessment. There is no obvious explanation for this, which gives rise to a real concern that the Local Plan and 'real world' Financial Viability Appraisal are markedly different. They shouldn't be. The assumptions borne out of the Local Plan Assessment would appear to be inconsistent with the evidence provided in support of actual development proposals and	8.23 On that basis, St William requests that draft Policy H3 is updated to align with London Plan Policy H5, reintroducing reference to the threshold approach and reintroducing a strategic target of 50% affordable housing making clear that that is a strategic target only and that in order to meet the Fast Track threshold the provision of 35% affordable housing is required (aside from industrial sites and public sector land in accordance with Footnote 59 of the London Plan). This update should take place in line with a review of the Local Plan Viability Assessment (Regulation 19) 2024 evidence base document to ensure the policy is supported by a robust evidence base that adequately acknowledges the exceptional abnormal costs as well as the correct quantum of development envisaged for each development site.	This wording change has not been made. We did not consider this change to be necessary as the plan is effective and deliverable. The retention of the gasholders and the remediation of contaminated land are not planning obligations, which relate to the nature of the proposed scheme being delivered. The retention of the gasholders and the remediation of contaminated land are costs associated with the land and would be required irrespective of the nature of the scheme being brought forward. As such, in line with paragraph 14 of the Viability PPG, such costs should be reflected in both the Benchmark Land Value and Residual Land Value. In addition, the policy and implementation text already provides sufficient flexibility for viability constraints to be considered and for site specific factors to be considered. As Berkeley will be aware, the flexibility in the existing policy was applied when the Council's planning committee considered their Bromley by Bow Gas Holders application. The flexibility in policy that was applied for this particular application is retained within the emerging Local Plan. Furthermore, the plan's viability report is justified, having been prepared in accordance with the PPG. A large sample of sites were viability tested, in accordance with PPG guidance, that suggests that plan-makers should test sites that provide a significant proportion of planned supply. With regards to Berkeley's comments on appraisal inputs, the Council notes that they cite the scheme specific FVA for the Bromley by Bow Gas Works Site in support of their assertion that there is a significant difference between the inputs to the Local Plan Viability Study and what they describe as "real world" assumptions. The Council does not agree with this suggestion – the Local Plan Viability Study tests a range of sites and schemes across the Borough and, critically, a range of outcomes, some of which are not dissimilar to the outcome of the Bromley by Bow Gas Holders FVA. Berkeley suggest that the build costs do not reflect realistic and "predictable" costs and that developments in Newham cannot be built for less than £300 per square metre. The costs are not out of kilter with the range of site-specific FVAs that are submitted to the Council in support of other applications. Furthermore, on major schemes tested in the Local Plan Viability Study, the costs can be as high as £450 per square foot when infrastructure costs are incorporated. With regards to finance costs, the Local Plan Viability Study considers viability over the plan period, rather than short term conditions prior to adoption. It is also reflective of other local plan viability studies undertaken by other London boroughs which have recently been examined and found sound. The profit margins in the Local Plan Viability Study reflect the standard measures of return, namely profit on GDV, as required by the PPG. IRR is rarely, if ever, used as a measure of return in such studies.

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																			therefore not sound. These need to be considered for specific sites that has been tested. 8.22 St William's former gasworks sites in particular are subject to a series of significant site constraints unique to these sites; including seven listed gas holder structures at Bromley by Bow, the only kind in the world; underground utilities cables and easements at Bromley by Bow and Stratford; designated and/or proposed SINC and Metropolitan Open Land at Bromley by Bow, Beckton Riverside and East Ham; TPO's; requirements for significant social infrastructure at Beckton Riverside; river frontage and associated flood and river wall and defences and safeguarded land and London City Airport height restrictions at Beckton Riverside. In all instances, significant remediation including the removal of existing or remnant gas infrastructure is required to enable these sites to come forward for development. These significant site constraints and associated exceptional abnormal costs must be balanced carefully when considering the quantum of affordable housing that could be delivered on these Sites as well as the requirement to meet all other planning policy objectives and whilst enabling development to come forward.		Section 106 requirements will be negotiated on the basis of scheme-specific requirements and cannot be established until schemes are brought forward at the development management stage. The contributions agreed will, of course, be considered alongside other factors, including levels of affordable housing and other material planning considerations.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/019a	Homes	H3 Affordable housing														Draft Policy H3 sets out the Council's approach to securing affordable housing delivery. Whereas the Regulation 18 draft Local Plan Policy was aligned to the London Plan requirements for affordable housing delivery, which was strongly supported in TSP's representations at the time, the Regulation 19 draft Local Plan introduces a requirement for 60% affordable housing by unit, comprised of 50% social rent and 10% affordable home ownership. Although it is acknowledged that the ability to meet the requirement can be viability tested, it is considered that this move away from the London Plan to more significant requirements is detached from the reality of housing delivery in the current environment, where housing completions in London have reduced on account of viability, attributable to a range of factors.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

Homes Comments to the full Regulation 19 Representations

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/019b	Homes	H3 Affordable housing														(...)Although less of a strategic issue, the discrepancy between the use of habitable rooms as a measure in the London Plan and units in the Regulation 19 draft Local Plan repeats an unhelpful misalignment that exists between current policies, undoing the alignment sought in the Regulation 18 draft Local Plan.		A change to this policy approach has not been made. We did not consider this change to be necessary as you achieve a greater proportion of family and affordable housing by using targets based on units rather than habitable rooms, thereby helping to ensure the policies are effective and positively prepared. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/019c	Homes	H3 Affordable housing															It should also align to the London Plan requirement for 'low cost rent' which can be either London Affordable Rent or Social Rent, rather than solely Social Rent, and "Intermediate" as the recognised definition of "affordable home ownership".	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the need to widen the definition of affordable home ownership. The Council recognises the importance of ensuring the Plan is effective and able to respond to changes to requirements for different affordable housing products (for example, the changes to this requirement under the NPPF 2024). We therefore drafted the following modification, which will be presented to the Inspector for their consideration: 1. Newham's policy priority is the provision of more social rent homes. Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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~~ **intermediate** housing. Developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4.2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/020	Homes	H3 Affordable housing														[Referencing the BNP Viability Study] The BNPP Study which supports the draft plan indicates that the amendments to draft Policy H3 between Regulation 18 and 19 stages would negatively impact on scheme viability. It could therefore risk reducing the total number of affordable homes that can be delivered over the plan period contrary to the objectives of the plan. Further, the Officer report to Newham's Cabinet Meeting held on 4th June 2024 stated that the affordable housing policy changes made following the full Council motion in December 2023 may cause deliverability challenges. This is because of the impact it could have on the Plan's viability. The Council is concerned that if it was to be submitted to an inspector for examination that it will be challenged and found to be unsound.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/050	Homes	H3 Affordable housing														TSP has reviewed the newly revised wording for Policy H3. The proposed increase in the proportion of social rent homes raises significant concerns from a viability perspective. To require residential development on individual sites with the capacity to deliver ten dwellinghouses or more to provide 50% of the total residential units as social rent housing and 10% of the total residential units as affordable home ownership housing is well in excess of the London Plan requirement. The move from 'low cost rent' to social rent only is also not supported. This wording should revert to alignment with the Regulation 18 draft, which was aligned to the London Plan. Likewise, affordable housing should be measured by habitable room, for alignment with the London Plan. Finally, from the wording of the policy it is hard to decipher the tenure split requirements and it is considered that it is better to set out a tenure split within an overall affordable housing percentage, which is the commonplace approach).	Accounting for our representations in relation to draft Policy H3, we propose the following revised wording, which is generally aligned to the Regulation 18 draft version, albeit with some amendments to further improve alignment to the London Plan [reword]: **1.Newham's strategic target is for 50 per cent of all new homes delivered across the Plan period to be affordable housing. This will be achieved through:** **a.the significant areas of Council and Greater London Authority land ownership within the borough where affordable housing will be prioritised; and** **b.delivering affordable housing through the threshold approach set out in the London Plan (2021); and** **c.delivering Newham's estate regeneration and affordable homes programmes; and** **d.supporting Registered Providers to deliver affordable homes.** **2.New residential developments on individual sites with the capacity for ten units or more should provide:** **a.the percentage of affordable housing required through the threshold approach as set out within Policy H5 of the London Plan (2021); and** **b.an affordable housing tenure mix by habitable room of 65 per cent low cost rent housing and 35 per cent intermediate homes.** **Developments that do not meet these requirements cannot follow the fast track route.** **3.New residential developments with the capacity for ten units or more should provide affordable housing on site. Where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions, the scale of the site or local context (including tenure mix), Newham may accept off site provision of affordable housing or exceptionally a payment in lieu of affordable housing provided that it would result in the ability to secure a higher level of affordable housing provision than the 50 per cent strategic target sought by part 1 above.** **4.New residential developments which seek to provide additional housing units either through an amendment to a current permission or an application to extend an existing development on the same or an adjoining site (where the extension is reliant on the existing permission or development to function or to meet policy requirements or standards required elsewhere in the plan), will be assessed against the requirements of Policy H3 based on the combined number of units of both the existing site or permission and the proposed new units.**	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. Moreover, we consider the wording in relation to the tenure split to be suitably clear, with the targets set out in relation to the percentage of overall homes that should be delivered as social rent versus other tenures. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/009	Homes	H3 Affordable housing						No	No							Both Draft Policies H3 (Affordable housing) and H8 (PBSA) set the affordable housing fast track route threshold at 60%. For conventional housing, draft Policy H3 requires 50% to be social rented and 10% to be shared ownership. In Build to Rent (BtR) developments (draft Policy H5) the requirement is to provide 50% at rents equivalent to London Affordable Rent (equivalent to social rent) and 10% at London Living Rent. Whilst we do not intend to present detailed viability evidence, it is clear that these thresholds will not be achievable and as such one of the key purposes of having a fast track route, to incentivise deliver through avoiding a late stage review mechanism, would not be achieved. We note that LBN's own Cabinet Report of 4th June 2024 has highlighted that "the affordable housing policy changes made following the Full Council motion in December 2023 may cause deliverability challenges for the Local Plan due to the impact on Plan viability". We would remind the Council that the Draft Local Plan will need to be "in general conformity" with the London Plan, which sets the fast track threshold at 35%, except where development is proposed on public or industrial land.	Recommendation 4: Amend Draft Policies H3 and H8 to align the fast track route threshold with the London Plan and the Regulation 18 Draft Local Plan. Suggested changes to wording of policies: H3 1: Newham's policy priority is the provision of more social rent homes. Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should provide **at least 35** ~~50~~ per cent of the total residential **habitable rooms** ~~units~~ as **affordable housing in line with the London Plan tenure split** ~~social rent housing and 10 per cent of the total residential units as affordable home ownership housing~~. Developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4.2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-217	LLDC		Reg19-E-217/003	Homes	H3 Affordable housing														[From 1. 040920 LBN LP Reg 19 response Cover Letter] It is noted that there is a significant change from the previous policy as included in the Regulation 18 stage draft Local Plan, which aligned with the London Plan Policy H5 and threshold approach for affordable housing, and sought an affordable housing mix of 65% social rent and 35% intermediate across the 50% affordable housing requirement. We are concerned that the proposed policy now requires sites with the capacity to deliver ten dwellinghouses or more to provide 50% of all housing as social rent housing and 10% as affordable home ownership housing, which is 60% affordable housing in total. Whilst we support the aspiration in the revised policy to maximise affordable housing including social rented housing within the housing mix, we are concerned about the significant impact of the revised policy on the viability of schemes and therefore the overall delivery of housing and affordable housing across the borough. Whilst the evidence base includes an updated viability assessment to support the Regulation 19 changes, there is no clear or robust evidence, that has been published, to support the increased affordable housing requirement and that this can be viably achieved. This is contrary to both paragraph 34 National Planning Policy Framework (NPPF), the associated Planning Practice Guidance and the London Plan and is likely to result in the majority of developments requiring a viability assessment to determine the maximum viable amount of affordable housing, removing the incentive provided by current London Plan policies for schemes to achieve the 35% or 50% threshold without the need for viability testing. We are also concerned that the draft policy will essentially not allow the delivery of intermediate housing outside of the 10% affordable home ownership requirement unless this is additional to the 60% affordable housing provision required, impacting the ability to meet local housing needs within other intermediate tenures and achieve mixed and balanced communities. Notwithstanding the viability issues, we consider that there is a need to achieve a range of affordable housing typologies to provide wider housing choice to meet a range of housing needs and achieve mixed and balanced neighbourhoods, which could include other forms of low cost rented housing as well as intermediate housing.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/20	Homes	H3 Affordable housing													Homes Policy H3: Affordable housing Ballymore strongly supports the use of the threshold approach as set out in the London Plan in determining the required level of affordable housing on a site. It is noted that residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should 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 (total 60% affordable housing) as opposed to a 65/35 split between social rent housing and intermediate homes previously identified within a requirement for 50% affordability (Regulation 18 version). We oppose to this suggested percentage of affordable housing as well as the suggested split given a stark lack of conformity with the London Plan, as well as ignoring the advice at paragraph 4 of Chapter 6 of the NPPF (delivery constraints). For the relevant evidence base, the Newham Strategic Housing Market Assessment (SHMA) 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. We note this has been exceeded through the requirements of the Regulation 19 plan, and additionally raise the concern that wider documents (such as the London Plan) must be balanced with the findings of SHMA – the identified mix within such wider documents recognises the balance of viability and alternative benefits a scheme may provide, which may limit the possibility for a very high percentage of affordability delivered. We believe the Council has not balanced the findings of the SHMA with wider policy implications, as well as environmental implications (i.e. the recent impacts of recession, and financial stagnancy, upon the development industry) which can cause, overtime, fewer homes being built during an increasingly challenging time. It is stated in the 'Main Changes from the Draft (Regulation 18) to the Draft Submission (Regulation 19) Newham Local Plan' document in relation to 'Homes', that this suggested percentage and split has been made following representations received from residents and feedback from councillors, including a full council motion and a recommendation by the Local Plan Scrutiny Commission and a representation, who felt the delivery of affordable housing and particularly social rent housing were important and key to ensuring the borough remained liveable for a range of residents. While this is not disputed it is important to consider that the Local Plan preparation is rooted in soundness and robustly tested from a viability perspective. We note that BNP have provided an updated evidence base which reviews changes and concludes: The results do not point to any particular level of affordable housing that a majority of schemes can viably deliver but the results do indicate that there are some development circumstances in which the emerging policy target of 60% could be		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

																			viable. The tenure mix of the affordable housing has a relatively modest impact on viability. Changing from a mix of 83% Social Rent and 17% Intermediate to 75% / 25% reduces residual land values by 11% on average, which is unlikely to be material to the outcome in many cases. However, where viability is marginal, changes to tenure could have a more significant impact and varying tenure mixes could be applied as an alternative to reducing the overall affordable housing percentage. Neither of these extracts are a glowing endorsement of the approach taken by the Council with regards to viability and point to a clear recognition that the policy approach will cause significant challenges to new development coming forward. The suggestion that any site can support the provision of 60% Affordable without grant is an unrealistic expectation. We fundamentally refute a number of assumptions in the Viability Assessment Report principally those relating to finance, build cost, benchmark land value, disposal costs and profit allowances. Our view is based on our 40 years plus as a developer with track record of having delivered some of London s most successful residential led regeneration schemes. Our extensive long term experiences, present day out turn construction costs and more recent processes to raise both equity and debt are at odds with most of the key assumptions made in the consultants Report Whilst we understand the importance in delivering genuinely affordable housing, the suggested 60% affordable threshold requirement, where most London Borough's dictate under 50% (and noting the Regulation 18 version required 50%), will significantly impact both the provision of smaller schemes (i.e. above 10 but below 30) and larger schemes, causing a strain between viability and the quicker delivery of housing. As identified in informative clause B4N4:2 of the Council's responses to Regulation 18 comments, which states that 'In exceptional cases, a shortfall of contributions towards the provision of infrastructure or affordable housing (including, but is not limited to, schemes which do not deliver the 60% affordable housing requirement) may be justified on viability grounds'. As such, it is highly likely the borough will receive a large portion of development requiring viability testing, impacting the pipeline for housing delivery and removing the fast-track approach, a key incentive to new development.		
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/77	Homes	H3 Affordable housing														We have strong concerns over the affordable housing requirements suggested, strongly impacting the viability of future schemes and resulting in a prolonged decision-making process. Disruption to the delivery of much needed housing within the borough will be heavily impacted given the restrictive nature of the suggested thresholds. It is important to balance, and account for, the acute need for affordable		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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

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																			housing with both wider policy guidance (i.e. the London Plan and NPPF) as well as considering the significant financial impacts to the development industry over the years. We believe the Council has not balanced the findings of the SHMA with the wider implications identified.		accommodation in the country. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/80	Homes	H3 Affordable housing														We consider draft Policy H3 (Affordable homes) to be most pressing, and we request the Council to review the affordable threshold of 60% taking the above into consideration. We believe further evidence and assessment is required to conclude final policy figures, accounting for the implications outlined.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-234	Places for London		Reg19-E-234/025	Homes	H3 Affordable housing						No	No						Blank	Whilst we recognise the need to significantly increase affordable housing delivery, the proposed approach in Policy H3 is not in general conformity with the London Plan and does not appear to be supported by robust evidence. The draft policy sets out a requirement for 60% affordable housing, of which, 50% should be social rent and 10% intermediate. Schemes which do not meet this requirement (and Policy H3 requirement for 40% family sized homes) would not be able to follow the Fast Track Route. The Viability Tested Route would need to be followed, with schemes also subject to early, late and (where appropriate) mid-stage review mechanisms. As one of the largest landowners in London we strongly support the degree of certainty and consistency across London that the Mayor's Fast Track Route provides. Our experience bringing forward development proposals across London is that 60% affordable housing is unlikely to be achievable in this context, meaning that most residential applications will need to follow the Viability Tested Route in Newham. This will create further planning delays and uncertainty which would ultimately frustrate housing delivery. This would frustrate the delivery of the Mayor's Fast Track Route strategy on affordable housing which seeks to incentivise applicants to follow this route where ever possible. To illustrate this tension, we would like to draw the Inspector's attention to the following paragraph in the London Plan (4.4.2): 'Past approaches have not adequately met levels of housing need. To provide greater certainty, speed up the planning process and increase affordable housing delivery, the Mayor is adopting a threshold approach to viability. This means that schemes meeting or exceeding the threshold without public subsidy, and consistent with the requirements in Part C of Policy H5 Threshold approach to applications, are not required to submit viability information. The threshold approach was first introduced in the Mayor's Affordable Housing and Viability SPG. It provides the opportunity to move away from protracted viability debates, create certainty in terms of affordable housing requirements, embed the requirements into land values, and offer a clear incentive for developers to increase affordable housing delivered through the planning system above the level in planning permissions granted in recent years.' We are not convinced that the proposed policy is supported by appropriate or robust evidence in terms of viability and recent rates of delivery (permissions) both in Newham and across London. Nor are we convinced that the policy would increase the delivery of affordable housing when compared to the approach in the London Plan. The Local Plan Viability Report, published as part of the evidence base, does not demonstrate that most sites or typologies	Modifications are required to ensure General Conformity with the London Plan.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

																			tested would be deliverable with a 60% affordable housing requirement. The conclusion of the BNPP viability report at paragraph 7.2 is relevant and states: 'There are significant variations in the percentages of affordable housing that can be provided, depending on private sales values (which vary significantly between the different sub-markets across the borough), scheme composition, requirements for infrastructure and community facilities including schools and places of worship, and benchmark land value. The results do not point to any particular level of affordable housing that a majority of schemes can viably deliver but the results do indicate that there are some development circumstances in which the emerging policy target of 60% could be viable. However, given the extent of appraisal outputs which indicate schemes will be viable with lower affordable housing percentages, we recommend that the target be applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account.' The LB Newham Cabinet Report associated with the Reg 19 draft Local Plan included the following: 'The affordable housing policy changes made following the Full Council motion in December 2023 may cause deliverability challenges for the Local Plan due to the impact on Plan viability. As testing deliverability is part of the 'effective' test of soundness, this may be challenged at examination. If this is raised during consultation, officers and members have a further opportunity to assess the Plan.' The Local Plan Viability Assessment notes that where development is required to provide on-site community infrastructure and/or highway or public transport infrastructure, they are less likely to meet the 60% threshold. This situation will be relevant to the majority of the Local Plan site allocations (particularly on large-scale brownfield sites around Canning Town and within the Royal Docks – where existing infrastructure is inadequate). This challenge is not recognised within the Council's proposed threshold approach. Furthermore, it is unclear whether the Local Plan Viability Assessment has properly considered the potential significant cost of infrastructure when undertaking its scenario testing for the various site allocations. It is our view that this scenario testing has significantly under-estimated build and infrastructure costs and therefore over-stated the viability (and therefore deliverability) of the various development sites. This proposed change removes any incentive for Applicants to increase affordable housing provision to achieve the threshold level – and the level of all developer-led affordable housing will be set by the outcome of a viability assessment. As pointed out by the GLA in its representation, this may well result in less affordable housing being delivered overall, and this view is supported by GLA's London wide monitoring data on permissions since the Mayor's Fast Track Route was introduced.		

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Reg19-E-234	Places for London		Reg19-E-234/026	Homes	H3 Affordable housing						No	No						Blank	Tenure split The proposed tenure split also diverges from the London Plan Policy H6 which makes it clear that the tenure requirement for affordable housing should be 30% each for low cost rent and intermediate housing products and the remaining 40% should be determined by boroughs. LB Newham's proposed approach effectively applies an 83:17 tenure split in favour of social rent, which would be contrary to the London Plan. We also disagree with certain conclusions within the Council's Local Plan Viability Assessment. The assertion that the tenure mix (83% Social Rented and 17% intermediate) is deliverable and will have a "relatively modest impact on viability", is not correct.	[Modifications are required to ensure General Conformity with the London Plan.]	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-234	Places for London		Reg19-E-234/027	Homes	H3 Affordable housing						No	No						Blank	The portfolio approach to affordable housing delivery London Plan Policy H4 states that public sector landowners that have agreements with the Mayor can take a portfolio approach to delivering 50% affordable housing across public landholdings in London. Where there is an agreement with the Mayor to deliver at least 50% affordable housing across a portfolio of public sector owned sites, then the 35% affordable housing threshold should apply to individual sites within that portfolio. This needs to be reflected in the wording of the draft Local Plan policy H3, Part 3. As currently drafted, this appears to be seeking to restrict such portfolio agreements to the borough of Newham only, which is not appropriate and not in line with the London Plan.	[Modifications are required to ensure General Conformity with the London Plan.]	A change to this policy approach has not been made. We did not consider this change to be necessary as the requirements of policy H4.6 seek to support portfolio approaches, while ensuring they do not undermine meeting Newham's largest housing needs for family and affordable homes. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/014a	Homes	H3 Affordable housing														I am getting in touch on behalf of Shelter London and the Newham Temporary Accommodation Action Group to make a joint submission to the Newham Local Plan Consultation. Please find attached: · The response form. · The Equalities Data form. · Shelter's Brick by Brick report, which contains a plan to deliver the social homes we need to end the housing emergency: Report on social housing - Shelter England [Hyperlink to https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/brick_by_brick]		Comment noted. Policy H3 prioritises the delivery of social rent homes, requiring Newham's policy priority is the provision of more social rent homes. Residential developments on individual sites with the capacity to deliver ten dwellinghouses or more should provide 50 per cent of the total residential units as social rent housing.
Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/014b	Homes	H3 Affordable housing														[I am getting in touch on behalf of Shelter London and the Newham Temporary Accommodation Action Group to make a joint submission to the Newham Local Plan Consultation. Please find attached: · The response form. · The Equalities Data form. · Shelter's Brick by Brick report, which contains a plan to deliver the social homes we need to end the housing emergency: Report on social housing - Shelter England [Hyperlink to https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/brick_by_brick]] · The final report on International Students in a Post-Pandemic Cost of Living Crisis, which is referenced in our submission.		Comment noted. Policy H8 seeks to deliver well-located, quality purpose built student accommodation to meet the needs of students (including international students). It also requires the delivery of affordable student accommodation to meet housing need.

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Reg19-E-001	London Gypsies & Travellers		Reg19-E-001/005	Homes	H4 Housing mix						No	No						Yes	3. Third concern: The omission of specific provisions for specialist housing adjusted for nomadic ways of life in "Our Newham Local Plan: HOMES", [Policies H1 (Meeting housing needs), H3 (Affordable housing)] and H4 (Housing mix). This neglect in pitch and site provisions has forced Gypsies and Travellers, whose recognized ethnic identities are protected under the Race Equality Act, and whose protected characteristic is their culture and heritage of nomadism, to resign themselves to living in standard "brick and mortar" accommodation. Their protected characteristic was legally recognized in 2020 in the Court of Appeal judgment that the "Gypsy and Traveller community have an enshrined freedom not to stay in one place but to move from one place to another". According to the 2021 UK census, approximately 390 people identifying as Gypsy or Traveller were residents of Newham. Fewer than a fifth of Newham's Gypsies and Travellers lived on the designated site. The needs of the other four fifths, those who are living in standard "bricks and mortar" housing, are imperfectly known, due to the methodological limitations of ORS's Newham GTAA, with the exception of one Irish Traveller family who have been campaigning for culturally appropriate housing with adjustments for nomadism for years, to no avail. Nevertheless, all Gypsies and Travellers in Newham have the right to culturally appropriate housing, as a human right detailed in the UN Committee on Economic, Social and Cultural Rights, General Comment 4: The right to adequate housing (Article 11 (1) of the International Covenant on Economic Social and Cultural Rights), 13 December 1991, para 8(g); and also General Comment 21: Right of everyone to take part in cultural life (Article 15, para 1(a), of the International Covenant on Economic, Social and Cultural Rights), 21 December 2009, para 16(e), which are covered by Article 8 of the UK Human Rights Act. London Gypsies and Travellers recommends that the right to culturally appropriate adequate housing, including with adjustments for nomadism, is mainstreamed in all housing policies by explicit mention in [Policies H1 (Meeting housing needs), H3 (Affordable housing)] and H4 (Housing mix), because Gypsies and Travellers live in a variety of tenures and situations.	[2) Under Policies H1 (Meeting housing needs), H3 (Affordable housing) and H4 (Housing mix), add the wording in bold to the existing wording in regular font:] [at H4] "a. the need to secure mixed and inclusive communities; and b. evidence of housing need as set out in Newham's latest Strategic Housing Market Assessment **and in the Gypsy and Traveller Accommodation Assessment**;"	The Council's objective for this policy approach is to ensure assessments of need are based on the most up-to-date evidence of housing need. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective and has therefore made your wording change, which is included in the modification table: [H4.1.b] evidence of housing need as set out in Newham's latest Strategic Housing Market Assessment **and in the Gypsy and Traveller Accommodation Assessment**;"

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Reg19-E-007	David Gilles		Reg19-E-007/010	Homes	H4 Housing mix						Blank	Blank						Blank	This is underpinned by the concession to developers on one bedroom and studio unit policies which now says; "This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Our target for no more than 15 per cent one bedroom homes on major developments has not been amended, as this target has been informed by evidence of housing needs."(see Appendix 7 P82). This has been inserted in the R19D text in policy H4.5 on P233 as follows: "H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported." This is alarming as studio flats, in effect bedsits, are inflexible, by definition small, and cannot provide decent sustainable accommodation on a long term basis. They are a tool used by developers in viability calculations to avoid the provision of a development mix in accordance with the Council's other requirement set out in the Plan. This addition should be reversed. Presumably it is the current requirement for Habitable Rooms which has allowed the recent and appalling Barrat scheme in Canning Town to receive Planning Permission.		The Council's objective for this policy approach is to improve the viability of residential schemes. However, the Council recognises the importance of ensuring the Plan is justified by our identified need for one bedroom properties and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

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Reg19-E-007	David Gilles		Reg19-E-007/030	Homes	H4 Housing mix						Blank	Blank						Blank	H4 1 : Housing mix P230 "1. All new residential developments should deliver a mix and balance of residential types and sizes. The appropriate mix of residential sizes, types and tenures will be determined through: a. the need to secure mixed and inclusive communities; and b. evidence of housing need as set out in Newham's latest Strategic Housing Market Assessment; and....." This text should be rephrased (and especially point 1.b.) to specify that the mix requirement should be determined by the need categories and numbers of those households requiring social and genuinely affordable housing rather than the text of the SHMA.		A change to this policy approach has not been made. We did not consider this change to be necessary as the plan's approach to affordable housing delivery is justified by a recently produced Strategic Housing Market Assessment (SHMA) undertaken using a robust methodology that has withstood scrutiny at Local Plan examinations. The Council is satisfied that the plan remains sound without the proposed changes. The SHMA is the underlying evidence of the Council's housing need, and this clause ensures that we are able to periodically update our needs evidence over the lifetime of the plan (for example, if we think it has become out of date).
Reg19-E-007	David Gilles		Reg19-E-007/031	Homes	H4 Housing mix						Blank	Blank						Blank	H4 2 Housing Mix P230: There should be a very clear steer that the 40% of family dwelling houses specified here should be social rent homes. We should also make clear, that because of the issues around housing need in Newham we are not prepared to accept less family homes than this on viability grounds. The logic of this is that developers should accept a lower return in Newham than the usually accepted 20% profit margin because of the Housing Crisis in the Borough. We should talk to the new Government asap about this and related matters in the NPPF. We should build on the draft GLA London Plan guidance on viability calculations and produce a public "Newham" model, that residents can also use to test developer proposals.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be positively prepared, justified and effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, including larger family-homes, and ensuring deliverability. The requirement to deliver family home is not restricted to a particular tenure, noting the Strategic Housing Market Assessment identified a significant need for family sized homes across both the private and affordable tenures. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. As well as ensuring the plan is positively prepared and justified, national policy requires us to demonstrate the plan is deliverable. Our viability evidence shows that is not possible in all circumstances to viably deliver our affordable housing target. Our approach to requiring viability assessments where policy targets cannot be met is therefore consistent with national policy, including planning practice guidance on deliverability. It is important in demonstrating the plan will be effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-015	Greater London Authority		Reg19-E-015/012	Homes	H4 Housing mix														There are also additional pressures / risks to the threshold approach and the delivery of affordable housing with the proposal that 40 per cent of all new homes are to be family homes containing 3 or more bedrooms.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, which includes a need for larger family-homes and the substantial need for both market and affordable three bed homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-021	Watkin Jones		Reg19-E-021/025	Homes	H4 Housing mix						Blank	Blank						Blank	Policy H4 is currently inflexible and does not align with the BTR market. WJG requests that Policy H4 is amended to allow the applicant to justify an alternative unit mix for BTR developments, particularly in locations which are considered less suitable for family living.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration,, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the

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																					requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/036	Homes	H4 Housing mix														We note that draft Local Plan Policy H4 (Housing Mix) seeks to provide a mix and balance of residential types and sizes, our client is supportive of the need to deliver a range of housing types, however, we would suggest that when considering comprehensive redevelopment proposals within site allocations, more flexibility should be afforded in regard to the proposed tenure split. Currently draft Policy H4 is restrictive in its wording and does not allow for individual sites to be developed both feasibly and based upon their own design merits. Subject to the viability of a scheme, it is also considered that the requirement for 40% family sized dwellinghouse is excessive	We therefore propose the following amendments are made to provide flexibility and ensure that the draft local plan is effective in its delivery "New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should **aim to** deliver 40 per cent of the number of new residential units as family dwellinghouses (C3) with three or more bedrooms, **subject to viability**. New residential developments on site allocations should **aim to** provide a minimum of five per cent of the proposed residential units as four or more bed affordable family dwellinghouses (C3), **subject to viability**"	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, which includes a need for larger family-homes and the substantial need for both market and affordable three bed homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/049	Homes	H4 Housing mix														Comment: Census 2021 data details that 32% of households in Newham already have 3 or more bedrooms a figure above Inner London boroughs as a whole. The NPPF requires local planning authorities to positively seek opportunities to meet the development needs of their area. It is not clear that this policy achieves this		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration,, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person

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																					homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/006	Homes	H4 Housing mix						Blank	No						Blank	Housing mixes are not flexible enough to respond to site characteristics; and		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration,, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person

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																					homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/024	Homes	H4 Housing mix						Blank	No						Blank	We support the amendments to the policy to allow up to 5% of units on new developments to be studios of 1bed-1person units. However, we still have concerns that the prescriptive mix set out in Parts 2-5 of the policy do not take account of the need to determine the appropriate mix considered individual circumstances of the sites, as set out in Part 1 e. In particular, there are concerns that required mixes do not take account of different needs or characteristics within the borough, with highly accessible areas such as Stratford having a higher demand for smaller units and more constrained sites. This is the reason that the existing targets are rarely met in developments and will result in lower housing and affordable housing delivery.	Therefore, we recommend the requirements in Parts 2-5 are proposed as boroughwide targets linked to affordable rented housing provision, where demand for family-sized units is greater. This would allow flexibility for the proposed market mixes to respond to market demand and allow flexibility for proposals respond to local need and site characteristics.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration,, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy

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Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/011	Homes	H4 Housing mix						Yes	No						Yes	Housing Mix Policy H4 still requires all new residential development to deliver a mix and balance of housing types, sizes and tenures. On sites of 10 units or more, the policy states that developments should deliver 40% of the number of new homes as family housing with three or more bedrooms. However, it is noted that a financial viability assessment can be submitted should this not be capable of being met. This is a very high proportion of family homes, and strict adherence to this policy could negatively impact scheme viability. We would recommend that LBN should consider the suitability of individual sites for this level of family housing, as some areas of the borough, and some sites will be more suitable than others for family housing. A 'one-size-fits-all' approach isn't always appropriate and there will need to be a degree of flexibility incorporated into the policy to reflect this.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, including larger family-homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/012	Homes	H4 Housing mix						Yes	No						Yes	It is further noted that the draft policy seeks for residential developments on site allocations to provide a minimum of 5% of proposed homes as four or more bedroom affordable homes. In terms of one bedroom, two person units, no more than 15% of units can be provided. Bellway still requests further clarification regarding this, particularly as the policy remains silent on two bedroom homes, only stating in the policy justification that two bedroom homes form a smaller proportion of the local housing need. These requirements are prescriptive and onerous and should be removed from the policy, especially in light of reducing demand for affordable homes secured via S106 Agreements by Registered Providers and Housing Associations across London.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be positively prepared, justified and effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for

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																					studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/005a	Homes	H3 Affordable housing						Blank	No						Blank	Housing – policies relating to increasing housing supply and affordable housing should be flexible and less prescriptive to allow sites to be optimised in accessible locations to meet demand and housing targets. Thresholds for affordable housing should also reflect London Plan targets. [Policies relating to housing mix should also be flexible enough torespond to site characteristics;]		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. 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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/005b	Homes	H4 Housing mix						Blank	No						Blank	Housing – policies relating to increasing housing supply and affordable housing should be flexible and less prescriptive to allow sites to be optimised in accessible locations to meet demand and housing targets. [Thresholds for affordable housing should also reflect London Plan targets.] Policies relating to housing mix should also be flexible enough torespond to site characteristics;		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy

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																					requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/018	Homes	H4 Housing mix						Blank	No						Blank	[Appendix 2 - Representations Part 1] GL raises concerns that Parts 2-5 policy do not take account of the need to consider an appropriate mix against individual circumstances nor the different needs or characteristics of particular sites, as set out in Part 1e. For example, highly accessible areas such as Stratford could have higher demand for smaller units. Parts 2-5 should therefore be amended as boroughwide targets linked to affordable rented housing provision, where demand for family-sized units is greater. This would allow flexibility to respond to market demand, local need and site characteristics. As we explained above, EV revolutionised the BtR market in the UK. This means that GL has a unique insight into the live issues affecting residents and it is important that no housing type/tenure/size is discouraged through planning policy. It is important that any planning policy does not prevent different housing types from coming forward/or rule out particular size and/or tenure mixes. All forms of housing should be allowed based on a scheme-byscheme basis as they contribute to: - Creating mixed and balanced communities; - Providing different housing types to meet different needs (e.g. entry level housing; housing for older people etc all of which give rise to very different considerations); - Innovation in the housing market; and - Allowing the housing market to respond to changing requirements.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration,, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the

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																					requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
Reg19-E-164	Canning Town Development Company Ltd	DP9	Reg19-E-164/008	Homes	H4 Housing mix														**[Other Draft Policies** Whilst we fully appreciate the extent of LBN's housing challenges and support the aspiration to address this, we have a number of concerns regarding the approach to affordable housing and dwelling mix in the Draft Local Plan, as follows.] In terms of housing mix (draft Policy H4), while it is acknowledged that the overall family housing (3+ bedroom) requirement increases by only one percent (39% to 40%), it must also be recognised that the currently 39% target is rarely met as there are several important factors that can influence the deliverable unit mix as recognised in London Plan Policy H10. To compound this, the proposed requirement for a minimum of 5% of 4+ bedroom units on site allocations further challenges the deliverability of family housing. The market demand and deliverability of this approach needs to be considered. LBN should consider if it is more appropriate to seek to apply these family housing targets to social rented homes only and should provide opportunities for exceptions were justified with evidence.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be justified and effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, which includes a need for larger family-homes and the substantial need for both market and affordable three bed homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-169	Silvertown Homes Ltd	DP9	Reg19-E-169/009	Homes	H4 Housing mix						Blank	No						Blank	[Policy H3 'Affordable Housing' & Policy H4 'Housing Unit Mix'] Similar concern around the effectiveness of the Local Plan is raised in relation to Policy H4 'Housing Size Mix' seeks to prioritise the delivery of family accommodation. Major residential development is required to provide 40% of the total number of dwellings with a minimum of three bedrooms, and at least 5% with a minimum of four bedrooms minimum. Policy H4 caps the number of one-bedroom homes at 20% of overall provision. Developments that do not meet these requirements on site and the delivery of the required level of affordable housing under Local Plan Policy H3.1 will not be supported unless and accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. The supporting text to the policy says that the housing size mix is justified by the findings of the Strategic Housing Market Assessment (SHMA) 2022 however the evidence of need also needs to be balanced alongside viability considerations and the need to make effective use of land to meet the Councils housing numbers.	The unit size mix policy should be amended to provide a different housing mix requirement for affordable and private tenures with a preference for family homes to be delivered within the affordable tenures but with greater flexibility provided for private homes to ensure development is viable and crucially can support the delivery of affordable homes.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, which includes a need for larger family-homes and the substantial need for both market and affordable three bed homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-169	Silvertown Homes Ltd	DP9	Reg19-E-169/013	Homes	H4 Housing mix						Blank	No						Blank	The Councils [affordable housing (H3) and] unit size mix (H4) polices should also be reconsidered and amended to align with the London Plan and ensure that development is viable, and capable of supporting and delivering the maximum viable number of homes.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/032	Homes	H4 Housing mix						Blank	No						Blank	Draft Policy H4 (Housing Mix) We note that draft Local Plan Policy H4 (Housing Mix) seeks to provide a mix and balance of residential types and sizes, Berkeley Homes is supportive of the need to deliver a range of housing types. Draft Local Plan Policy H4 sets out the following requirements in terms of housing mix: New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver 40 per cent of the number of new residential units as family dwellinghouses (C3) with three or more bedrooms. New residential developments on site allocations should provide a minimum of five per cent of the proposed residential units as four or more bed affordable family dwellinghouses (C3). New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom, two person dwellinghouses (C3). New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 5 per cent of the number of new residential units as studio or onebedroom, one person dwellinghouses (C3). We would suggest that when considering comprehensive redevelopment proposals within site allocations, more flexibility should be afforded in regard to the proposed tenure split. Currently draft Policy H4 is restrictive in its wording and does not allow for individual sites to be developed both feasibly and based upon their own design merits. It is also considered that the requirement for 40% family sized dwellinghouse is excessive and would not be suitable in all parts of the borough and all development types. It is recognised that there may be a greater need to deliver family social rented homes in the borough and this target should be focused on affordable tenures of this type. However, it is not appropriate for set bedroom mix targets for market or intermediate housing. There is not policy support for delivering market homes that do not reflect market demand.	As in line with paragraph 31 of the NPPF, which states that policies should 'take into account relevant market signals', we suggest the following wording is added to allow for the market to dictate whether 40% family homes is appropriate. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should **aim to** deliver 40 per cent of the number of new residential units as family dwellinghouses (C3) with three or more bedrooms, **taking into account market signals.** New residential developments on site allocations should **aim to** provide a minimum of five per cent of the proposed residential units as four or more bed affordable family dwellinghouses (C3), **taking into accountmarket signals** Making this change would provide flexibility and it will ensure that the draft local plan is effective in its delivery.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, which includes a need for larger family-homes and the substantial need for both market and affordable three bed homes, and ensuring deliverability. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-173	L&Q		Reg19-E-173/017	Homes	H4 Housing mix														The proposed housing mix (Policy H4) is currently very rigid, particularly in terms of setting a maximum level of 1-bedroom units and minimum level for 3 bedroom+ units, and the proposed 40% 3 bed requirement is extremely onerous. Not all locations are suited to family housing, and this is particularly true of private sale homes, which are required to provide cross-subsidy to affordable rented tenures. Indeed, the London Plan at Policy H10.A indicates that local planning authorities should provide an appropriate mix of unit sizes based on various factors, including (inter alia): (6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity 7) the aim to optimise housing potential on sites 8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock 9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing. It is suggested that the policy incorporates some flexibility for sites to be suitably optimised, particularly in light of the factors highlighted at London Plan Policy H10.A. In particular, flexibility also be given to infill housing on estates that meet broader policy objectives.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration,, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy

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																					requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-173	L&Q		Reg19-E-173/020	Homes	H4 Housing mix													In addition, the requirement for a financial viability assessment in cases where the level of family size units is not met, appears to be irrespective of the level of affordable housing proposed. The significantly onerous requirements of draft Policy H4, in combination with draft Policy H3.1 (as currently worded) would in combination likely mean than no policy compliant scheme could come forward in the borough. This would result in the disproportionate need for effectively all schemes to be viability tested, and also is likely to disincentivise development in some instances. For these reasons, it is considered that draft Policy H4 is not effective.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. While the viability assessment that supports the plan shows viability challenges in meeting our affordable housing 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, in tandem with housing mix policies, will become easier to deliver over the plan period. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve either policy target, thereby ensuring the plan remains effective and deliverable. Affordable housing and family housing represent the most significant housing needs in the borough. Therefore, it is essential that where policy targets are not met, that schemes are robustly scrutinised to ensure the maximum viable amount of these homes are delivered. The Council is satisfied that the plan is sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5**

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																					per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy. Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
Reg19-E-173	L&Q		Reg19-E-173/021	Homes	H4 Housing mix			H4.2												Suggested amended wording: '2. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver 40 per cent of the number of new residential units as family dwellinghouses (C3) with three or more bedrooms, **unless circumstances indicate that this is not appropriate to the location.** Developments that do not meet these requirements on site and the delivery of the required level of affordable housing under Local Plan Policy H3.1 will not be supported unless and accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-174	Daniel Blaney		Reg19-E-174/004	Homes	H4 Housing mix														Studios I alarmed by the insertion of new wording which permits developers to propose studio flats as acceptable housing in new developments. This is an unacceptable form of housing tenure in Newham, and planning officers and elected members have worked together successfully to resist studios in recent years.	I regard it is a complete overhaul of policy that should not be sneaked in through this plan writing process. I am concerned there has been insufficient consultation on this matter, given the restricted nature of the Regulation 19 consultation and its purposes.	The Council's objective for this policy approach is to improve the viability of residential schemes. However, the Council recognises the importance of ensuring the Plan is justified by our identified need for one bedroom properties and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-178	Royal Docks		Reg19-E-178/037	Homes	H4 Housing mix						Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.] <u>Detailed Comments Schedule:</u> Linked to H3 Affordable Housing, the prescriptive requirements for minimums of 40% 3beds and 5% 4beds and maximum of 15% 1beds are likely to have impacts on viability that will inhibit affordable housing provision. The percentages for housing mix should therefore have some flexibility to ensure viable and deliverable proposals can be developed.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy

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																					requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/006	Homes	H4 Housing mix						Blank	Blank						Blank	Housing We support that the delivery of council/social rent housing family units should be the utmost priority.		Support noted.
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/007	Homes	H4 Housing mix						Blank	Blank						Blank	We support Newham's priority is the provision of social rent homes, however in redevelopment council rent homes should not be replaced with social rent homes (which is typically £50 per week more expensive).	There should be like-for-like replacement in terms of units numbers, rent levels (including service charge) and tenancies.	A change to this policy approach has not been made. We did not consider this change to be necessary as the approach in the plan is positively prepared, with policy H2.1a setting out that social rent housing needs to be reprovided as social rent floorspace. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/011a	Homes	H4 Housing mix						Blank	Blank						Blank		[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] H4: Housing mix - We believe that the minimum percentage of family-sized social rent units (5-15%) is inadequate given the need in Newham of 60 per cent family-sized homes (three beds or larger).	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, including larger family-homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/011b	Homes	H4 Housing mix						Blank	Blank						Blank		[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] [H4: Housing mix - We believe that the minimum percentage of family-sized social rent units (5-15%) is inadequate given the need in Newham of 60 per cent family-sized homes (three beds or larger).] - We believe that secure tenancies must be provided on new developments, as they will reduce the plight of Temporary Accommodation and the instability of the private rented sector. This is in addition to like-for-like replacement of properties which housed residents in secure council tenancies.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council's mandatory licencing requirements for rented accommodation help to address quality issues in all rented accommodation. In addition to this Policy H2 requires that affordable housing that is replacing social rent housing floorspace should be re-provided as social rent floorspace. Policy H5 also sets out requirements for build to rent accommodation, including requirements for secure tenancies. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/17	Homes	H4 Housing mix														In terms of housing mix (draft Policy H4), while it is acknowledged that the overall family housing (3+ bedroom) requirement increases by only one percent (39% to 40%), it must also be recognised that the currently 39% target is rarely met as there are several important factors that can influence the deliverable unit mix as recognised in London Plan Policy H10. To compound this, the proposed requirement for a minimum of 5% of 4+ bedroom units on site allocations further challenges the deliverability of family housing. The market demand and deliverability of this approach needs to be considered.	We recommend that LBN should consider defining dwelling mix targets for different tenures, with the higher family housing targets being applicable to the low cost rented homes for which there is greater demand.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, which includes a need for larger family-homes and the substantial need for both market and affordable three bed homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/017	Homes	H4 Housing mix			H4.2											Policy H4: Housing mix Hadley recognises the need to provide a housing mix that supports the assessed need in the Borough. However, Hadley also recognises that different parts of the Borough may have different needs and suggest that policy should provide an element of flexibility to allow sites to reflect neighbourhood specific requirements. Part 2 states that "new residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver 40% of the number of new residential units as family dwelling houses (C3) with three or more bedrooms. Developments that do not meet these requirements on site and the delivery of the required affordable housing under Local Plan Policy H3.1 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered". Hadley remains concerned that this will place increased financial pressure on the delivery of schemes, particularly when balancing this with the delivery of affordable housing. Development sites have a number of competing requirements that need to be balanced and there is currently a disconnect in the DSLP between the policy requirements for affordable housing and for design. The current approach to incorporate such high levels of family housing could put significant pressure on the financial viability of development and optimisation of sites. The policy should recognise the market context and sub areas across the borough and recognise the need for flexibility in the unit mix. Hadley therefore supports the approach to testing viability where less than 40% family housing is provided. In addition, Hadley objects to the inclusion of Part 3 which states that new residential developments should provide "a minimum of five percent of the proposed residential units as four or more bed affordable family dwelling houses (C3)" and requests that a fallback is included for schemes that do not meet this requirement to demonstrate this through a financial viability assessment.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, which includes a need for larger family-homes and the substantial need for both market and affordable three bed homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/019	Homes	H4 Housing mix													[Policy H4: Housing mix] Hadley welcomes the incorporation of greater flexibility to the provision of studio units and one bed units to improve viability of residential schemes. Hadley is however concerned by the limit to one bed, two person units to 15% of residential units, and the limit of studios to 5% of residential units. While recognising the housing need within Newham for family sized housing, Hadley notes that these one bed units often help improve the viability and deliverability of residential schemes, supporting the delivery of the required family housing. Therefore, Hadley requests that the proportion of one bed and studio units within a residential scheme should be increased.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be positively prepared, justified and effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for

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																					studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
Reg19-E-189	London Square Ltd	DP9	Reg19-E-189/008	Homes	H4 Housing mix						Yes	No						Yes	In terms of housing mix (draft Policy H4), while it is acknowledged that the overall family housing (3+ bedroom) requirement increases by only one percent (39% to 40%), it must also be recognised that the currently 39% target is rarely met as there are several important factors that can influence the deliverable unit mix as recognised in London Plan Policy H10. In terms of the proposed requirement for developments on site allocations to provide a minimum of 5% of proposed residential units as four or more bed affordable family dwellinghouses (C3), this further challenges the deliverability of family housing. The market demand and deliverability of this approach needs to be considered. LBN should consider if it is more appropriate to apply these family housing targets to social rented homes only and should provide opportunities for exceptions were justified with evidence. As such, it is suggested that the target mix should be broken down to reflect different tenures; for example, the family housing targets should apply specifically to social rent to reflect demand, as identified in the Newham Strategic Housing Market Assessment 2022, but with greater flexibility provided for private homes to provide a mix that reflects market demand to ensure development is viable and crucially can support the delivery of affordable homes.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective. The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need for family housing, which includes a need for larger family-homes and the substantial need for both market and affordable three bed homes, and ensuring deliverability. Where the family housing or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/050	Homes	H4 Housing mix							Yes	Yes	Yes	Yes	Yes			Policy H4 Housing mix 8.26 St William recognises the general approach to housing mix which aims to deliver a mix and balance of residential types and sizes with the intention of securing mixed and inclusive communities, informed by housing need set out in Newham's latest Strategic Housing Market Assessment; development viability; the existing and pipeline mix of residential units in the area and importantly the individual circumstances of the site. This general approach to housing mix is considered to be positively prepared, justified, effective and consistent with national policy therefore meeting all tests of soundness set out in the NPPF.		Comment noted.

Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/021	Homes	H4 Housing mix														In terms of housing mix (draft Policy H4), while it is acknowledged that the overall family housing (3+ bedroom) requirement increases by only one percentage point (39% to 40%), it must also be recognised that the current 39% target is rarely met as there are several important factors that can influence the deliverable unit mix as recognised in London Plan Policy H10. To compound this, the proposed requirement for a minimum of 5% 4+ bedroom affordable units on site allocations further challenges the deliverability of family housing, especially when coupled with a very restrictive cap of one-bedroom two person units (15%). The market demand and deliverability of the proposed family housing requirement needs to be reconsidered, including in the context of the impact of a very high resultant child yield, which can be a cause of operational concern for housing associations.	We echo these concerns [concerns raised in the Officer Report to Newham's Cabinet Meeting held on 4th June 2024] and request that the emerging wording of this policy is reverted to that in the Regulation 18 draft Local Plan albeit with the terminology updated to refer to "low cost rent" and "intermediate" tenures, again in alignment with the London Plan, clarification that the tenure split is based on habitable rooms, and removal of the reference to schemes not providing a policy compliant unit mix in terms of family units (draft Policy H4) not being eligible for the fast-track route. Appendix A includes a proposed revised wording of the policy in line with these comments. (...)TSP therefore considers that the requirements for 40% family housing (3+) should be deleted from the policy, or at most, stated to apply as targets to low cost rented homes only, with the opportunity for exceptions to apply where justified with evidence. Likewise, requirements for 4+ bedroom housing should be removed and the maximum allowance for one bedroom units should be removed.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. With regards to the implications of high child yield on playspace provision, a change to this policy approach has not been made. We did not consider this change to be necessary as this requirement has informed the modelling of site allocations. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-

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																					by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/051	Homes	H4 Housing mix														The proposed increase in family (3+ bedroom) housing from 39% under the existing Local Plan to 40% may appear to be minor but when coupled with the new requirement for a minimum of 5% 4-bedroom affordable units and a very restrictive cap on one bedroom units raises several concerns, as follows: For the market housing, there is a significant concern about the viability of a high concentration of family homes and a limited concentration of 1-bedroom units. It is acknowledged that developments seldom achieve the current targets for this reason and therefore the benefit of seeking a further concentrated supply of family units is questioned. In addition to testing the viability of the unit mix sought, LBN should also satisfy itself that the unit mix is deliverable in the context of the resultant significant child yield and the knock-on implications for operators of affordable housing and demand in terms of playspace. TSP considers that the requirements for 40% family housing (3+) should be deleted from the policy, or at most, stated to apply as targets to social rented homes only, with the opportunity for exceptions to apply where justified with evidence. Likewise, requirements for 4+ bedroom housing should be removed, there should be no maximum allowance of one bedroom two person units. The 5% studio allowance should be retained.	Overall, we propose that the wording of Policy H4 is amended as follows: 1. All new residential developments should deliver a mix and balance of residential types and sizes. The appropriate mix of residential sizes, types and tenures will be determined through: a. the need to secure mixed and inclusive communities; and b. evidence of housing need as set out in Newham's latest Strategic Housing Market Assessment; and c. development viability; and d. the existing and pipeline mix of residential units in the area; and e. the individual circumstances of the site in terms of site conditions, local context and site features, particularly on sites delivering below ten dwellinghouses (C3). 2. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver ~~40~~ **39** per cent of the number of new low cost rent residential units as family dwellinghouses (C3) with three or more bedrooms. ~~Developments that do not meet these requirements on site and the delivery of the required level of affordable housing under Local Plan Policy H3.1 will not be supported unless and accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.~~ ~~3. New residential developments on site allocations should provide a minimum of five per cent of the proposed residential units as four or more bed affordable family dwellinghouses (C3).~~ ~~[4. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom, two person dwellinghouses (C3).~~ 5. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 5 per cent of the number of new residential units as studio or one-bedroom, one person dwellinghouses (C3).] 6. In exceptional circumstances, a portfolio approach to the delivery of affordable housing and/or family dwellinghouses (C3) may be accepted, subject to developments not resulting in an unacceptable impact on the mix and balance of residential types and sizes in an area. Developments within a portfolio delivering additional affordable housing and/or family dwellinghouses (C3) should be located in Newham, and completed and ready for occupation prior to the developments within the portfolio that deliver affordable housing and/or family dwellinghouses (C3) below the policy target set out in H3.1 and H4.2.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. With regards to the implications of high child yield on playspace provision, a change to this policy approach has not been made. We did not consider this change to be necessary as this requirement has informed the modelling of site allocations. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-

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																					by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/011	Homes	H4 Housing mix						No	No							Draft Policy H4 In terms of housing mix, the effect of Draft Policy H4 is to require 40% of new units as 3bed+, a minimum of 5% as 4bed+ affordable, no more than 15% as 1b2p and no more than 5% as studio/1b1p. This applies across all forms of conventional housing, included BtR. This will clearly present a risk to viability and does not give sufficient flexibility to enable accessible town centre sites, such as the SCE, to provide more appropriate mix of housing to better address specific site circumstances and contribute to overall housing delivery. We are also concerned that the required unit size mix is not broken down to reflect different tenures. For example, it would be more appropriate to require a higher proportion of 3+ bed units in social rented tenure, but less so in market and intermediate housing.	Recommendation 5: Amend Draft Policy H4 to recognise that highly accessible town centre sites should be allowed more flexibility to provide smaller units; as well as greater flexibility for BtR developments where a mix of smaller homes is more appropriate. The housing mix should also be reflect the requirements of different tenures. Suggested changes to policy wording: H4: Add **New residential development in highly accessible town centre locations and Build to Rent developments are more suited to provide a mix of smaller units. The requirements of Part 2 of this policy will be applied flexibly to these types of residential development.**	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the

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																					requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-217	LLDC		Reg19-E-217/004	Homes	H4 Housing mix													[From 1. 040920 LBN LP Reg 19 response Cover Letter] We broadly support the policy intent on housing mix but have concerns about the blanket approach set out in the policy which is considered overly prescriptive and does not allow for site specific context and considerations to be properly taken into account. The policy should better reflect the supporting evidence base which shows that there is an acute need for affordable family housing and allow for greater flexibility across market tenures to support this. Although some exceptions to the policy on housing mix have now been included in the proposed policy, these are very limited and a greater degree of flexibility is required where schemes are clearly providing other major benefits such as the provision of affordable housing, significant infrastructure and regeneration benefits, or where amendments are being sought to schemes with extant planning permissions with an accepted housing mix baseline which will have informed scheme viability and the scope of planning obligations, including the level of affordable housing. The policy should also recognise that there may be some sites where larger family sized units are not considered as suitable as other sites, and where a greater mix of smaller units would be more appropriate, particularly where higher densities are being promoted by the London Plan and Local Plan. Through the use of viability assessments to determine housing mix, the draft Local Plan recognises impact of the proposed cap on studios, 1 and 2 bedroom units on viability, however, it would be helpful for the policy to set out how housing mix sits with the Council's other priorities, including the achievement of overall housing delivery and affordable housing which may be compromised. The policy should reflect these other priorities and allow flexibility particularly across market tenures to support the delivery of them.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. Furthermore, the plan sets out through policy BFN4 how the Plan's objectives should be prioritised where substantiated financial viability constraints are present on a site. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include

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																					student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/26	Homes	H4 Housing mix														Policy H4: Housing mix Ballymore supports the Council's desire to ensure residential developments deliver a range of housing types and sizes to secure quality, mixed and balanced communities, however, we do raise concerns regarding the increasing requirements in terms of unit mix set out within draft policy H4. It is considered that the Council should prioritise the delivery of affordable family housing (where there is the most acute need) and allow greater flexibility across the market homes to support the delivery of these affordable family homes. Draft policy H4 seeks to secure 40% of all new homes as family housing (an increase from the current policy position of 39%). As set out above, we have concerns that this will place increased financial, and time, pressure on the delivery of schemes and, particularly when balanced with increased affordable housing delivery set out in Policy H3 above, could have significant impacts on the viability and delivery of schemes (particularly large strategic sites). We support the inclusion of viability testing within the draft policy to demonstrate when this isn't achievable, however we raise concerns that increased targets, and a lack of flexibility, will result in increased viability testing as opposed to Fast Track applications, thus slowing the overall delivery of housing. Flexibility should enable the Council to take a more objective view on a case by case basis, accounting for other affordable housing and scheme benefits proposed. As currently drafted, we have significant concerns that draft policy H4 would jeopardise the delivery of the Council's other housing ambitions and policy requirements (such as affordable housing), and therefore suggest the above revisions be made to allow greater flexibility across the market tenure. Further, we don't consider the 15% limit on 1b2p units and a complete resistance to studios to be supported by appropriate evidence and we query whether this has been robustly viability tested as part of the Local Plan process, if not it should be. In addition, the draft policy seeks to resist the delivery of studios and 1b2p homes are limited to 15% of the total provision. These smaller units often help to improve the viability and deliverability of a scheme, thereby allowing the scheme to support a higher proportion of family housing across the affordable tenure. We would support the Council in resisting these smaller units within the affordable element of a scheme, however, contend that studios should be allowed as an element of the overall private housing offer of a scheme to support the viable delivery of sites.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy

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																					requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-234	Places for London		Reg19-E-234/028	Homes	H4 Housing mix						Blank	No						Blank	The approach to housing mix is overly prescriptive and is likely to be undeliverable on the vast majority of sites. As currently worded the policy would disqualify the Fast Track Route for any schemes which do not provide 40% family sized homes (3 and more bedrooms) across all tenures. This is not appropriate for the reasons set out above – since it would be undeliverable in most cases and would therefore undermine the functioning of the Fast Track Route and mean that in likelihood almost all residential applications in Newham would need to follow the Viability Tested Route. We consider that it is appropriate for Newham to set out its size mix expectations for social rent accommodation, given this relates directly to their Council house waiting lists and statutory housing duties. This would provide helpful clarity to applicants. However, we do not consider this to be an appropriate or sound approach on market tenure homes which are influenced by variety of dynamic factors such as affordability, viability, sales rates and market absorption rates in an area, as well as site location, density, land use mix. The proposed blanket policy approach fails to recognise that certain types of location lend themselves to higher levels of provision of smaller 1 and 2 bedroom homes in market sale, market rent or intermediate tenure, for example, town centres, as allowed for within London Plan Policy H10. This degree of nuance seems to be entirely lacking from Policy H3. The proposed draft policy also seeks to cap the percentage of one bedroom, two person homes to 15% across all tenures, which also we consider to be overly prescriptive and unjustified.	Modifications are required to ensure General Conformity with the London Plan.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy

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																					requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
Reg19-E-021	Watkin Jones		Reg19-E-021/023	Homes	H5 Build to Rent housing						Blank	Blank						Blank	Build to Rent WJG is generally supportive of the approach suggested by draft Policy H5		Support noted.

Reg19-E-021	Watkin Jones		Reg19-E-021/024	Homes	H5 Build to Rent housing			4			Blank	No						Blank	[Built to rent WJG is generally supportive of the approach suggested by draft Policy H5,] but raises objection to the "dual viability" approach detailed within part 4 of the draft policy. The suggested approach adds a level of complexity and is not an approach advocated within NPPG, the London Plan or reflected within the planning policies of other local planning authorities. Policy H11 of the London Plan states "viability assessments on such schemes should take account of the differences between Build to Rent and Build to Sale development and be undertaken in line with the Affordable Housing and Viability SPG". The Affordable Housing and Viability SPG further clarifies that there are distinctly different economic between build to rent and build for sale schemes. Paragraph 3.183 also appears to recognise this, which states "Affordable housing policy requirements for the policy have been formulated using Newham's latest evidence of housing need. Therefore, this policy broadly reflects the affordable housing tenure mix requirements set out in Policy H3 for build for sale general needs housing developments." [authors emphasis] Build to rent and build for sale schemes are also physically different. For example, build to rent schemes will have a significantly increased provision of amenity space and management facilities, and a potentially different mix of units and sizes. In order to assess the viability of a build for sale development, two architectural schemes would need to be designed for the same site, one presenting a build to rent scheme and one presenting a build for sale scheme. This is overly onerous and complex. H5(3) requires 50% LAR and 10% LLR equivalent rents. However (4) states that (2) or (3) apply. Policy H4(2) applies to BTR expecting 40% 3 bed units without providing evidence of why this should be dictated by policy for the managed rental market. Notably the Local Plan Viability Report (April 2024) prepared by BNP Paribas states at paragraph 6.27: "Clearly there are differences in outcomes between build for sale and build for rent schemes, with the latter generating lower residual values and (in some cases) lower affordable housing levels as a consequence. There are some circumstances where 60% affordable housing is viable, but many schemes can only provide lower levels of affordable housing". And: "In general, the appraisals indicate that the viability of build to rent schemes is somewhat more challenging than build for sale schemes". The conclusions of this Report in relation to BTR to not provide sufficient justification to justify the Council's affordable housing approach for BTR, which differs significantly from national practice and guidance and is not going to support the delivery of much needed homes.	Given that the economics and physical characteristics of these two models are different, viability assessments should only be assessed for the relevant model. It is therefore requested that part 4 of the draft policy is replaced with the following: "Developments of Build to Rent housing that fail to deliver sufficient affordable housing in accordance with the requirements of parts 2 or 3 above are required to submit a detailed financial viability assessment".	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the policy is positively prepared, seeking to align our affordable housing delivery with housing need. Furthermore, the design quality requirements for build to rent and build for sale homes are the same under Local Plan Policy H11, and therefore should not require the production of different architectural drawings for dual viability assessments. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the implementation of the policy and the need to align the rents to social rent levels, to make this housing tenure more affordable. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration. This modification seeks to clarify that the homes do not need to be managed by a Registered Provider. It also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website. [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~A~~affordable ~~Rented H~~**h**omes**, rented** at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~A~~affordable ~~Rented H~~**h**omes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.

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Reg19-E-021	Watkin Jones		Reg19-E-021/026	Homes	H5 Build to Rent housing			1.h			Blank	Blank						Blank	Policy H5 1(h) requires on site management. This an unnecessary definition of BTR as schemes can be successfully managed by off site teams and management teams that are on-site periodically.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is in conformity with Policy H11 of the London Plan, noting the London Plan policy also allows for this flexibility. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/006	Homes	H5 Build to Rent housing			H5.2 & H5.3			Blank	Blank						Blank	Policy H5 – Build to Rent housing Parts 2 and 3 2. Developments of Build to Rent housing as a block or phase within a larger development are expected to deliver affordable housing that meets the requirements of Local Plan Policy H3. 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as Affordable Rented Homes at equivalent rents to London Affordable Rent and 10 per cent of the total units being Affordable Rented Homes at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. Unite make the following comments on Parts 2 and 3 of Policy H5: 1. The London Plan Policy H11 (Build to Rent) specifies that for schemes where Build to Rent (BTR) comprises only a portion of the development, the delivery of affordable housing through Discounted Market Rent (DMR) can only be applied to this element of the development and not the portion for sale to the market. However, Part 2 of the draft Policy above does not match the wording of the London Plan and instead states that where BTR is within a larger development then affordable housing must be provided in accordance with the Draft Local Plan's Affordable Housing Policy (Policy H3). The Affordable Housing Policy requires the provision of 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 therefore does not align with the London Plan. 2. Additionally, with regards to Part 3 of the Policy, this requires 50% of total units as London Affordable Rent and 10% of total units as London Living Rent. This differs from the London Plan Policy H11 which requires 35% affordable housing (or 50% where the development is on public sector land or industrial land appropriate for residential uses) in the form DMR. Of the DMR homes 30% should be London Living Rent and the remaining 70% should be affordable rent. The requirements of draft Policy H5 therefore significantly exceed the requirements of the London Plan. 3. The Policy provides no evidence or robust justification for why these requirements are onerous and beyond those included with the London Plan.	Recommendations On the basis of the above comments, Unite make the following recommendation to better align with the London Plan: • Amend the BTR affordable housing requirements to align with those within the London Plan in terms of both how the policy is applied to BTR elements within larger developments and the percentage contribution.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the policy is positively prepared, seeking to align our affordable housing delivery with housing need. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the implementation of the policy and the need to align the rents to social rent levels, to make this housing tenure more affordable. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration. This modification seeks to clarify that the homes do not need to be managed by a Registered Provider. It also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website. [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/101	Homes	H5 Build to Rent housing														No comment.		Comment noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/025	Homes	H5 Build to Rent housing						Blank	No						Blank	The same concerns are raised on the requirements for 60% affordable housing as Policy H4, which are not sound with the London Plan Policy H5 and impact the viability and deliverability of housing in the borough.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target seeks to meet identified need for social rent homes, the

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																					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. The importance of meeting the need for social rent homes is also emphasised by the new requirement in the NPPF 2024. While the viability assessment that supports the plan shows viability 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. The policy 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. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/026	Homes	H5 Build to Rent housing						Blank	No						Blank	The extensive proposed criteria that developers must meet if development is able to qualify as build to rent are very restrictive and unnecessary. Stratford Metropolitan Centre has demonstrated the benefits of the built to rent typology over conventional rented accommodation through the provision of communal spaces and shared amenities under a managed development. Therefore, any necessary restrictions should be controlled through planning obligations, subject to meeting the regulation 122 tests from the CIL Regulations.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is in conformity with Policy H11 of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/019	Homes	H5 Build to Rent housing						Blank	No						Blank	[Appendix 2 - Representations Part 1] GL generally welcome the principles under Policy H5 but recommend suggestions to refine Policies H3 and H4 (as explained above) to ensure consistency with Policy H5.		Comment noted. Please see the Council's responses to the aforementioned comments.

Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/020	Homes	H5 Build to Rent housing						Blank	No						Blank	[Appendix 2 - Representations Part 1] GL would also note that the affordable housing within H5 is described as Affordable Rent which is defined at Appendix 1 to the draft plan as housing let by local authorities or registered providers. It is assumed this is a drafting error as, in line with London Plan Policy H11 and the NPPF, affordable homes within Build to Rent can be owned and managed by the building owner (who may not be a Registered Provider).	It is suggested that the affordable housing within Policy H5 be referred to as Discounted Market Rent (DMR).	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the policy is positively prepared, seeking to align our affordable housing delivery with housing need. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the implementation of the policy and the need to align the rents to social rent levels, to make this housing tenure more affordable. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration. This modification seeks to clarify that the homes do not need to be managed by a Registered Provider. It also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website. [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~Aa~~affordable ~~Rented Hh~~omes**, rented** at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~Aa~~affordable ~~Rented Hh~~omes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/012	Homes	H5 Build to Rent housing						Blank	Blank						Blank		[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] H5: Build to Rent housing - Build to Rent housing should be obliged to meet the minimum of 50% social rent housing not simply Affordable Rented Homes such as London Affordable Rent which is more expensive	The Council's objective for this policy approach is to align our affordable housing delivery with housing need. However, the Council recognises the importance of ensuring the Plan is effective and therefore, noting the GLA no longer publishes benchmark rents for London Affordable Rent, has therefore drafted the following modification, which will be presented to the Inspector for their

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																					consideration: [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~Aa~~affordable ~~Rented Hh~~homes**, rented** at equivalent rents to ~~London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~Aa~~affordable ~~Rented Hh~~homes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to ~~London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.

Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/020	Homes	H5 Build to Rent housing													Policy H5: Build to Rent Housing Hadley notes the criteria set out for developments to qualify as Build to Rent and acknowledges the requirement for Build to Rent housing as a block or phase within a larger development should deliver affordable housing. The DSLP sets out a requirement for 65% London Affordable Rent and 35% equivalent to London Living Rent. Build to Rent housing can face different viability constraints as value is not realised until later in the development. London Plan Policy H11 sets out that the affordable housing offer within Build to Rent schemes can be solely discounted market rent. The DSLP should be in line with the London Plan and should delete reference to Policy H3.		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the policy is positively prepared, seeking to align our affordable housing delivery with housing need. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the implementation of the policy and the need to align the rents to social rent levels, to make this housing tenure more affordable. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration. This modification seeks to clarify that the homes do not need to be managed by a Registered Provider. It also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website. [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~A~~affordable ~~Rented H~~**H**omes**, rented** at equivalent rents to ~~London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~A~~affordable ~~Rented H~~**H**omes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to ~~London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/047	Homes	H5 Build to Rent housing							No						8.18 The Regulation 19 Local Plan seeks to provide the same affordable housing target and tenure mix for sale and build to rent homes. This approach is inconsistent with the London Plan Policy H11 which states that the affordable housing offer can be solely Discount Market Rent (DMR) Part C of London Plan Policy H11 states that the Mayor expects at least 30% DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70% at a		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the policy is positively prepared, seeking to align our affordable housing delivery with housing need. The Council is satisfied that the plan remains sound without the proposed changes.

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																			range of affordable rents. Footnote 68 states that boroughs may wish to publish guidance setting out the proportion of DMR homes to be provided at different rental levels to benefit from the Fast Track Route. In setting local DMR requirements boroughs should have regard to the relationship between the level of discount required and the viability of achieving the relevant threshold level. The Regulation 19 Local Plan and supporting viability study has not tested the viability impacts and has instead adopted a blanket approach, this fails to highlight the distinct financial differences between a for sale and build to rent scheme, which is inconsistent with national and regional policy. Where affordable housing target and tenure types are the same there is incentive for a developer to come forward with a build to rent scheme, given the clawback/covenant restrictions.		However this policy approach also received comments which raised concerns regarding the implementation of the policy and the need to align the rents to social rent levels, to make this housing tenure more affordable. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration. This modification seeks to clarify that the homes do not need to be managed by a Registered Provider. It also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website. [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~Aa~~ffordable ~~Rented Hh~~omes**, rented** at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~Aa~~ffordable ~~Rented Hh~~omes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/049a	Homes	H5 Build to Rent housing							No							8.24 As currently drafted, Policy H3 (and the same requirements within Policy H5) are not considered to be effective, justified or positively prepared and therefore fail to meet the tests of soundness within the NPPF and we consider that this has the potential to deter sites from coming forward.	8.25 Policy H5 Part C requires units within Build to Rent developments to be held as Built to Rent under a covenant for at least 15-years. The Renters Rights Bill proposes to make provision the changing the law about rented homes, including provision abolishing fixed term assured tenancies and assured shorthold tenancies; and imposing obligations on landlords. This Bill is considered to suitably support tenants to ensure they are protected and it is therefore considered that Policy H5 Part C should be removed. [Appendix 12: General Policies – Suggested amendments] 1. To qualify as a Build to Rent development the following criteria should be met: ~~c. the dwellinghouses (C3) should be held as Build to Rent under a covenant for at least 15-years; and~~	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is effective, being in conformity with Policy H11 of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/049b	Homes	H5 Build to Rent housing							No							8.24 As currently drafted, Policy H3 (and the same requirements within Policy H5) are not considered to be effective, justified or positively prepared and therefore fail to meet the tests of soundness within the NPPF and we consider that this has the potential to deter sites from coming forward.	[8.25 Policy H5 Part C requires units within Build to Rent developments to be held as Built to Rent under a covenant for at least 15-years. The Renters Rights Bill proposes to make provision the changing the law about rented homes, including provision abolishing fixed term assured tenancies and assured shorthold tenancies; and imposing obligations on landlords. This Bill is considered to suitably support tenants to ensure they are protected and it is therefore considered that Policy H5 Part C should be removed. [Appendix 12: General Policies – Suggested amendments] 1. To qualify as a Build to Rent development the following criteria should be met: ~~c. the dwellinghouses (C3) should be held as Build to Rent under a covenant for at least 15-years; and]~~ 3. Developments of Build to Rent housing as the sole residential tenure should provide **affordable housing in line with the threshold approach as set out within Policy H5 of the London Plan (2021)**. ~~at least 50 per cent of the total units as Affordable Rented Homes at equivalent rents to London Affordable Rent and 10 per cent of the total units being Affordable Rented Homes at equivalent rents to London Living Rent.~~ These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the policy is positively prepared and justified, seeking to align our affordable housing delivery with housing need. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the implementation of the policy and the need to align the rents to social rent levels, to make this housing tenure more affordable. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration. This modification seeks to clarify that the homes do not need to be managed by a Registered Provider. It also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website. [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/049c	Homes	H5 Build to Rent housing							No							8.24 As currently drafted, Policy H3 (and the same requirements within Policy H5) are not considered to be effective, justified or positively prepared and therefore fail to meet the tests of soundness within the NPPF and we consider that this has the potential to deter sites from coming forward.	[8.25 Policy H5 Part C requires units within Build to Rent developments to be held as Built to Rent under a covenant for at least 15-years. The Renters Rights Bill proposes to make provision the changing the law about rented homes, including provision abolishing fixed term assured tenancies and assured shorthold tenancies; and imposing obligations on landlords. This Bill is considered to suitably support tenants to ensure they are protected and it is therefore considered that Policy H5 Part C should be removed.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective, positively prepared and justified. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been

																					[Appendix 12: General Policies – Suggested amendments] 1. To qualify as a Build to Rent development the following criteria should be met: ~~c. the dwellinghouses (C3) should be held as Build to Rent under a covenant for at least 15 years; and~~ 3. Developments of Build to Rent housing as the sole residential tenure should provide **affordable housing in line with the threshold approach as set out within Policy H5 of the London Plan (2021)**. ~~at least 50 per cent of the total units as Affordable Rented Homes at equivalent rents to London Affordable Rent and 10 per cent of the total units being Affordable Rented Homes at equivalent rents to London Living Rent.~~ These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c.] 4. Developments of Build to Rent housing that fail to deliver sufficient affordable housing in accordance with the requirements of parts 2 or 3 ~~and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4.2~~ will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. Developments of Build to Rent housing that are required to submit a detailed financial viability assessment should submit dual viability assessments that incorporate viability testing that set outs outcomes in relation to 'Build for Rent' and 'Build for Sale' approaches and the subsequent impact upon the delivery of affordable housing.	informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham's housing target is set to be delivered. As such these locations are of strategic importance in ensuring we deliver sufficient new family homes in the borough. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration,, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis.

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																					[…] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.

Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/051	Homes	H5 Build to Rent housing							No							8.27 However, to reiterate comments provided to the Regulation 18 consultation draft of the Local Plan, St William considers Parts [2, 3,] 4 and 5 of this draft policy to go against the overarching objective of creating mixed and inclusive communities by prescribing and limiting the quantum of unit sizes. The need to deliver more family homes is recognised, but policy should only ascribe quanta to affordable homes in respect of the mix. 8.28 The requirement for 40% of homes to be delivered as family sized homes (3 bedrooms or more) and a minimum of 5% to be provided as four or more bed affordable homes as noted previously is particularly onerous and we previously requested that the wording of this policy is revised to instead seek to maximise the provision of family sized homes (in particular the 4 bed homes). It is understood that there is a need for family homes in the borough however this requirement should not serve to delay or hinder the delivery of much needed homes across the borough and further flexibility should be incorporated into this policy to be considered sound. 8.29 As previously noted 2 bedroom 4 person homes play an important role in meeting family housing need both in terms of being able to provide sufficient space for a young family but also by being more affordable. Furthermore, it is noted that Newham has one of the youngest populations in London with an average age of 32.7 years old (paragraph 1.5). The delivery of a higher proportion of smaller sized units would assist in meeting local housing need as well as helping to create a mixed and inclusive community. As previously set out we request that further flexibility is incorporated into this policy by removing the maximum caps on one bedroom, two person homes and studios. This is an approach that the London Borough of Tower Hamlets are taking in their emerging Local Plan which in particular seeks to offer the greatest flexibility on unit mix for private home provision and an approach that also aligns with London Plan (Policy H10) which enables the proposed housing mix to be considered on a case-by-case basis and genuinely reflect local housing need. 8.30 It is recognised there is an overarching need to deliver family social rented homes within the borough and the policy target of 40% should remain for this tenure type. This aligns with the London Plan Policy H10 Part B where the low cost rent size of units is evidenced by borough needs. However, it is not appropriate to set bedroom mix targets for market or intermediate housing and this is inconsistent with Policy H10. The intermediate and market housing mix should be informed by local demand and provided in suitable locations. The London Plan recognises that well designed one and two bedroom homes in suitable locations can attract those wanting to downsize from their existing homes, freeing up existing family stock (London Plan Policy H10 Part 9). There is no policy support for delivering market homes which do not reflet market demand.	[Appendix 12: General Policies – Suggested amendments] 2. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver 40 per cent of the number of new residential units as family dwellinghouses (C3) with three or more bedrooms. Developments that do not meet these requirements on site and the delivery of the required level of affordable housing under Local Plan Policy H3.1 will not be supported unless and accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 3. New residential developments on site allocations should **seek to maximise the number of** ~~provide a minimum of five per cent of the~~ proposed residential units as four or more bed affordable family dwellinghouses (C3).. ~~4. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom, two person dwellinghouses (C3).~~ 5. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 5 per cent of the number of new residential units as studio or one-bedroom, one person dwellinghouses (C3).	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the Council considers the policy to be effective. We have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. Newham's target to deliver no more than 15% one-bedroom homes and no more than 5 per cent studio or one person dwellings have been informed by evidence of housing needs. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. Furthermore our target for the delivery of family sized homes, with 5% affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. The Viability Report accompanying the plan recommends the retention of the family housing policy. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets, thereby ensuring the plan remains effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment: [Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom~~, two person~~ dwellinghouses (C3). […] [Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom~~, two person~~ homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis. […] [Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person

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																			8.31 As currently drafted, overall draft Policy H4 is not considered to be justified or effective and therefore does not meet the tests of soundness set out in the NPPF. 8.32 St William's suggested amendments to the wording of this policy are set out in Appendix 12. It is only with these amendments that this policy could be considered sound.		homes on major development sites. **This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.** Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/052	Homes	H5 Build to Rent housing														It is considered that this policy is not required as its requirements largely replicate those of Policy H11 of the London Plan, and therefore it should be deleted.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is in conformity with Policy H11 of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/012	Homes	H5 Build to Rent housing						No	No							Draft Policy H5 To reiterate concerns raised at Regulation 18 stage, delivery of low cost rented tenure homes as part of Build to Rent developments can be challenging, particularly where a constrained site means only a single building with one access core can be delivered. This is because Registered Providers (RPs), who would own and manage the LAR homes, would be unlikely to take on units that are 'pepper-potted' within a single building. We acknowledge that a wholly intermediate affordable housing offer could be agreed through a viability exercise, however this would unfairly penalise a Build to Rent developer with a late stage viability review mechanism in circumstances where it is unfeasible to comply with the tenure split requirement for practical reasons. The policy should reflect this and ensure that the London Plan Policy H11 tenure split can be followed in single building Build to Rent developments.	Recommendation 6: Amend draft Policy H5 to refer to the London Plan Policy H11 tenure split for single building Build to Rent developments, reflecting the challenges of delivering low cost rent units in these circumstances. Suggested changes to policy wording: H5 3: Developments of Build to Rent housing as the sole residential tenure **can** ~~should~~ provide **a wholly intermediate affordable housing component in line with the requirements of London Plan Policy H11** ~~at least 50 per cent of the total units as Affordable Rented Homes at equivalent rents to London Affordable Rent and 10 per cent of the total units being Affordable Rented Homes at equivalent rents to London Living Rent.~~ These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the policy is positively prepared, seeking to align our affordable housing delivery with housing need. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the implementation of the policy and the need to align the rents to social rent levels, to make this housing tenure more affordable. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration. This modification seeks to clarify that the homes do not need to be managed by a Registered Provider. It also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website. [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to ~~London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to ~~London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/32	Homes	H5 Build to Rent housing														Policy H5: Build to Rent housing Ballymore supports the inclusion of a Build to Rent policy within the draft Local Plan, the delivery of Build to Rent (BtR) housing can often improve the viability of a scheme (particularly as part of a wider strategic site) and therefore will assist the Council in meeting their housing targets over the Plan period. The Build to Rent requirements set out	DMR (Discounted Market Rent) housing is therefore the only appropriate affordable tenure within Build to Rent housing, and the draft policy should be amended to reflect London Plan policy H11 in this regard.	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the policy is positively prepared, seeking to align our affordable housing delivery with housing need. The Council is satisfied that the plan remains sound without the proposed changes.

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																			within draft Policy H5 largely reflect Policy H11 in the London Plan and are therefore supported, with the exception of the affordable housing requirement. At present, the draft policy requires affordable housing within BtR schemes to be provided in line with draft policy H3 – i.e. a 50/10 tenure split between social rent and affordable ownership housing. However, it is not appropriate to provide social rent housing within a Build to Rent block as this would require the provision of a separate core and for the social rented accommodation to be under separate management (i.e. a Registered Social Landlord).		However this policy approach also received comments which raised concerns regarding the implementation of the policy and the need to align the rents to social rent levels, to make this housing tenure more affordable. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration. This modification seeks to clarify that the homes do not need to be managed by a Registered Provider. It also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website. [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.
Reg19-E-234	Places for London		Reg19-E-234/029	Homes	H5 Build to Rent housing						Blank	No						Blank	Much of the draft Policy H5 Part 1 repeats London Plan Policy H11 verbatim. We do not consider this to be necessary, given this is already part of the Development Plan.	Modifications are therefore required to ensure General Conformity with the London Plan and ensure deliverability.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is in conformity with Policy H11 of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-234	Places for London		Reg19-E-234/030	Homes	H5 Build to Rent housing						Blank	No						Blank	The approach to affordable housing does not appear to be in line with the London Plan, given that this allows Build to Rent schemes to provide Discount Market Rent affordable housing (London Living Rent and other genuinely affordable rents) and be eligible for the Fast Track Route where the requirements of London Plan Policy H11, Part C are met.	[Modifications are therefore required to ensure General Conformity with the London Plan and ensure deliverability.]	The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the policy is positively prepared, seeking to align our affordable housing delivery with housing need. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the implementation of the policy and the need to align the rents to social rent levels, to make this housing tenure more affordable. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration. This modification seeks to clarify that the homes do not need to be managed by a Registered Provider. It also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website. [H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being ~~A~~affordable ~~Rented H~~homes**, rented** at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c. […] [H5.3 Implementation text] Part 3 of the policy sets out affordable housing delivery expectations on sites where Build to Rent is proposed as the sole housing tenure within a development. In these instances, affordable Build to Rent housing should be provided as affordable ~~rented~~ housing, with 50 per cent of the total units ~~as~~ **rented** ~~Affordable Rented Homes~~ at equivalent rents to~~ London Affordable~~ **Social** Rent and 10 per cent of the total units being **rented**~~Affordable Rented Homes~~ at equivalent rents to London Living Rent. ~~Weekly rent benchmarks for London Affordable Rent are published on the Greater London Authority's website.~~ The Mayor of London publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually on the Greater London Authority's website.
Reg19-E-234	Places for London		Reg19-E-234/031	Homes	H5 Build to Rent housing						Blank	No						Blank	Whilst the need for unified on-site management and the option for longer tenancies. However, we do not consider that minimum tenancy lengths should be required or mandated by policy. This limits flexibility for the benefit of residents – who may for example want to live in the property for two years before purchasing a shared ownership property. Their circumstances may also change. The proposed policy approach on requiring	[Modifications are therefore required to ensure General Conformity with the London Plan and ensure deliverability.]	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is in conformity with Policy H11 of the London Plan. There is also flexibility in the policy wording that these needed to be offered, rather than being mandatory. The Council is satisfied that the plan remains sound without the proposed changes.

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																			minimum three-year tenancies appears to go further than the London Plan Policy H11, which states that tenancies of this length should be made available, rather than mandated as minimums.		
Reg19-E-234	Places for London		Reg19-E-234/032	Homes	H5 Build to Rent housing						Blank	No						Blank	Furthermore, whilst we appreciate that the restriction on the number of homes (50) comes from the London Plan, we do not see why there is a need for this restriction. Why 50? What impacts the ability to deliver and operate a smaller scale BTR development to the same level of quality and value as a larger scale? What interest is this specific criterion seeking to protect?	[Modifications are therefore required to ensure General Conformity with the London Plan and ensure deliverability.]	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is in conformity with Policy H11 of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-234	Places for London		Reg19-E-234/033	Homes	H5 Build to Rent housing						Blank	No						Blank	Similarly, there should no need for a covenant or clawback where a Build to Rent development has been viability tested as shown in Part 4 of the draft Policy H5. In practice, developers could apply for planning permission for conventional housing (Class C3) and operate this as BTR without requiring planning permission.	[Modifications are therefore required to ensure General Conformity with the London Plan and ensure deliverability.]	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is in conformity with Policy H11 of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-012	Bavani Navaratnam		Reg19-C-012/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.		Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-013	Mariam Paul		Reg19-C-013/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.		Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need. Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-013	Mariam Paul		Reg19-C-013/005	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Harnessing the power of Supported Accommodation: If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization. Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these ' New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers. I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider policy H6 to be both effective and justified, noting the policy requirements are based on meeting the needs of relevant Council commissioning teams. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-C-014	Rohima Shila		Reg19-C-014/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.	Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-014	Rohima Shila		Reg19-C-014/005	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Harnessing the power of Supported Accommodation: If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization. Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these ' New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers. I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider policy H6 to be both effective and justified, noting the policy requirements are based on meeting the needs of relevant Council commissioning teams. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-C-015	Sabina John		Reg19-C-015/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.		Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-015	Sabina John		Reg19-C-015/005	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Harnessing the power of Supported Accommodation: If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization. Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these ' New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers. I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider policy H6 to be both effective and justified, noting the policy requirements are based on meeting the needs of relevant Council commissioning teams. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-C-016	Balbir Kaur		Reg19-C-016/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.		Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-016	Balbir Kaur		Reg19-C-016/005	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Harnessing the power of Supported Accommodation: If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization. Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these ' New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers. I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider policy H6 to be both effective and justified, noting the policy requirements are based on meeting the needs of relevant Council commissioning teams. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-018	Chris Deacon		Reg19-C-018/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	It complies	None.	Comment noted.

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Reg19-C-019	Thayalini Kamalakaran		Reg19-C-019/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.	Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-020	Devaki		Reg19-C-020/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.		Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-021	Andy Lambell		Reg19-C-021/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.	Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-021	Andy Lambell		Reg19-C-021/005	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Harnessing the power of Supported Accommodation: If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization. Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these ' New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers. I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider policy H6 to be both effective and justified, noting the policy requirements are based on meeting the needs of relevant Council commissioning teams. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-C-024	Just Homes Charity		Reg19-C-024/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.		Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-025	Gabriel Ogunkoya		Reg19-C-025/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.	Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-026	Alister Probert		Reg19-C-026/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.	Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-030	Aslam Virk		Reg19-C-030/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.	Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-030	Aslam Virk		Reg19-C-030/005	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Harnessing the power of Supported Accommodation: If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization. Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these ' New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers. I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider policy H6 to be both effective and justified, noting the policy requirements are based on meeting the needs of relevant Council commissioning teams. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-C-031	Santhamalar Mylvakanam		Reg19-C-031/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.		Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-031	Santhamalar Mylvakanam		Reg19-C-031/005	Homes	H6 Supported and specialist housing						Yes	Yes						Yes	Harnessing the power of Supported Accommodation: If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization. Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these ' New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers. I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider policy H6 to be both effective and justified, noting the policy requirements are based on meeting the needs of relevant Council commissioning teams. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-C-032	Shafiul Ali Akther		Reg19-C-032/001	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers. Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy. Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.	Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-C-032	Shafiul Ali Akther		Reg19-C-032/005	Homes	H6 Supported and specialist housing						Yes	Yes						Yes		Harnessing the power of Supported Accommodation: If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization. Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these ' New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers. I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider policy H6 to be both effective and justified, noting the policy requirements are based on meeting the needs of relevant Council commissioning teams. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-019	Delia Taasin		Reg19-E-019/002b	Homes	H6 Supported and specialist housing														Accommodation-based support providers can play a crucial part in supporting the council to address some of these multiple needs. Supported Accommodation are specifically for people 'who want to and agree to be' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.		Comment noted. The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need.

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Reg19-E-019	Delia Taasin		Reg19-E-019/006	Homes	H6 Supported and specialist housing														Harnessing the power of Supported Accommodation: If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. [...]Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these ' New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers.	Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider policy H6 to be both effective and justified, noting the policy requirements are based on meeting the needs of relevant Council commissioning teams. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-019	Delia Taasin		Reg19-E-019/007	General	H6 Supported and specialist housing														I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.		Comment noted. The Local Plan seeks to meet the needs of supported housing providers through the requirements of policy H6.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/102	Homes	H6 Supported and specialist housing														No comment.		Comment noted.

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Reg19-E-024	Home Builders Federation		Reg19-E-024/029	Homes	H7 Housing for older people			1.b				No							H7: Specialist housing for older people Policy H7 is unsound in part because it does not reflect fully the London Plan. Part 1, b) stipulates that housing for older people will be supported within a 400m radius of a local centre or 800m of a town centre. The policy should be amended to reflect better the aim of the London Plan at H1 which supports residential developments within 800m of a town centre boundary or train station or within PTALs 3-6. While we accept that some older people may not be able to walk or cycle as far as others, many will still be very active, and schemes will be certainly be suitable if they can access train / tube / docklands light railway stations.	The policy should also be amended to refer to the older person's housing benchmark targets supporting London Plan at Policy H13 at Table 4.3. This advises the need for 85 units of older person's housing is provided each year in Newham. This is necessary to ensure that this level of need is provided for in the borough. This is not a target, as such, but a benchmark to aim for.	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan allows for flexibility of location where specific care needs and/or vulnerabilities justify an alternative location. We have not included the London Plan benchmark as this will be considered in the round as part of the development plan in decision making. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/103	Homes	H7 Housing for older people														No comment.		Comment noted.
Reg19-E-021	Watkin Jones		Reg19-E-021/001	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	Please see below the comments of the Watkin Jones Group PLC (WJG) in relation to the Regulation 19 Newham Local Plan review. Our representations reflect upon our Regulation 18 submission, and focus on the land use policies in the consultation document relevant to the residential tenures that we deliver. As such, this representation focuses primarily on the following policies: • Purpose Built Student Accommodation (PBSA) – Policy H8 • Large scale purpose built shared living (LSPBSL) or co-living – Policy H9 and H11 • Build to Rent (BTR) – Policy H4, H5 and H11 These are addressed in turn, along with our proposed recommendations to ensure that the Plan meets the tests of soundness set out in Paragraph 35 of the National Planning Policy Framework (NPPF) – namely, positively prepared, justified, effective and consistent with national policy.		Comment noted.

Reg19-E-021	Watkin Jones		Reg19-E-021/004	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	Purpose Built Student Accommodation <u>Need for PBSA and Location Criteria</u> WJG questions whether the Council has assessed whether the location-based criteria would provide sufficient sites to cater for the significant and increasing demand for PBSA. The Council's SHMA (2022) details that: • The number of households comprising of only students has nearly doubled since 2011. • It is expected that students attending new university campuses in Stratford will increase the number of students studying in Newham by between 15,000 and 25,000. • The SHMA recognises that the increasing number of students will have increased pressure on housing stock, through an increased number of students renting privately. • The SHMA recognises that student accommodation counts towards housing completions. The above points focus upon future student growth trends for the future Plan period, and less so on the current demand for student accommodation in the borough. The following presents some further indicators of the existing demand for PBSA. This information has been extracted from the Student Needs Assessment prepared by Knight Frank which accompanied WJG's application for PBSA on Grove Crescent Road, Stratford: • There are approximately 21,500 students attending universities Stratford. • There are only around 5,700 PBSA bedspaces within this area (university or privately owned). This means that only 26% of students have access to PBSA, 74% do not. • The number of full-time students studying at institutions in Stratford has increased by 32% in the last five years. The supply of PBSA has not kept up with demand. The problem will be further exacerbated in new supply is constrained. • It is estimated that approximately 10,000 additional students will be studying in Stratford by 2027. • This will result in students occupying other forms of residential accommodation in the borough (e.g. uncontrolled houses in multiple occupation) needed by other residents within the borough. Student accommodation trends have also been changing in recent years, with more second and later year students, as well as postgraduates, favouring PBSA over other forms of accommodation (e.g. HMOs). Evidence of this is provided by Pavilion Court in Wembley, a 699 bed PBSA development managed by Fresh. Within this academic year, only 16% of residents are first year students. This proportion of first year students is reflective of PBSA developments managed by our sister company Fresh across the UK and over recent years. There is anticipated to be high demand for PBSA is across London strategically, and that this is only going to increase significantly due to the increasing numbers of students that will study in Stratford (e.g. UCL's East Campus). The evidence above demonstrates that a significant increase in the amount of PBSA is required in Newham.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation', how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the

																			WJG considers that the approach suggested by the Council is too restrictive and will not result in the supply of sufficient, well-located PBSA bedspaces. WJG also considers that the approach suggested by draft Policy H8 is not in conformity with the London Plan. The Local Plan should confirm with the approach detailed within Policy H15B of the London Plan, namely: *"Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes".* WJG recognises that Newham's Local Plan adopts a town centre or campus first approach to PBSA and would support a similar approach on the basis that it does not mean that PBSA must be located within the town centre or campus. Through draft Policy H8 the Council is seeking to introduce a highly restrictive approach to PBSA in the borough than is provided through Policy H15 of the London Plan. Given the current and increasing need for PBSA over the Plan period in Newham, this approach is not sound. Given that draft Policy H2 protects all forms of housing other than student accommodation, Policy H8's approach will require even greater emphasis on the provision of new PBSA to address demand, and accommodate for potential future bedspace loss.		borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan. [...] [Policy H8 Implementation text - ALL section] This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved~~

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																					~~development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-021	Watkin Jones		Reg19-E-021/005	Homes	H8 Purpose-built student accommodation						Blank	Blank						Blank	[Purpose Built Student Accommodation Need for PBSA and Location Criteria] WJG recognise that the Council, like most others, has competing land pressures and high housing targets. The Plan should recognise in writing what the provision of an increased amount of PBSA can offer: • Counting towards the Council's housing completions. • Using land efficiently, resulting in land being available for other uses. • If sufficient PBSA is provided above existing and future demand, it will result in other existing and future homes being occupied by students (e.g. apartments, HMOs) being released back to the market and provided much needed homes for others (as recognised by NPPG, 034 Reference ID: 68-034-20190722).		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. With regards to the policy freeing up HMO accommodation, Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation', how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or

b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and
c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or
d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough.

3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.

4. New purpose-built student accommodation should:

a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or
b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and
c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to.

5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need.

6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

[...]

[Policy H8 Implementation text - ALL section] This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be:
• over 25 per cent of net residential

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																					approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-021	Watkin Jones		Reg19-E-021/006	Homes	H8 Purpose-built student accommodation			1			Blank	No						Blank	Part 1 of Policy H8 is unduly restrictive. It accepts in principle need for PBSA and accepts the benefits of locating such accommodation in Stratford and Maryland only in two circumstances. The two neighbourhoods have naturally attracted most of the Borough's student accommodation investment in recent years given their highly sustainable relationship with new higher educational campuses. As drafted the policy all but prevents any new student accommodation for the lifetime of the development plan. The justification text provides no justification but rather repeats the provision of the draft policy.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation', how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the

borough.

3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.

4. New purpose-built student accommodation should:

a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or
b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and
c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to.

5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need.

6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

[...]

[Policy H8 Implementation text - ALL section] This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be:
• over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or
• a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved~~

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																					~~development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-021	Watkin Jones		Reg19-E-021/007	Homes	H8 Purpose-built student accommodation			1.a			Blank	Blank						Blank	In respect of 1(a), the definition of "existing campus development" should be made clear with examples provided of those that exist today. The need to be directly adjacent to such developments is unduly restrictive and a reasonable travel distance (for example 1,200m as used in Part 5 of the Policy) should instead be incorporated which would still achieve sustainable patterns of residential development and related movements. Such amendments would more genuinely support the identified need for PBSA within the Borough. This principle should also apply to 2(a) of this draft policy for the same reasons.		The Council's objective for this policy approach is to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. However, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, that defines 'campus' and 'adjacent to': This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

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Reg19-E-021	Watkin Jones		Reg19-E-021/009	Homes	H8 Purpose-built student accommodation			1.b			Blank	Blank						Blank	In respect of 1(b), it is assumed that "facility" refers to existing student accommodation (this should be clarified). The policy should also allow for moderate increases in bed spaces to viably accommodate and encourage the sustainable renewal of older stock to address matters such as poor energy performance and fire risk. As a developer of student accommodation, it would be unusual to anticipate a refurbishment or rebuild project that would be viable and deliverable without some form of net additional bedspaces (return on investment). This principle should also apply to 2(d) of this draft policy for the same reasons.		A change to this policy approach has not been made. We did not consider this change to be necessary as relaxing the wording would weaken our position to provide purpose-built student accommodation that helps meet the need of HEIs in Newham. Furthermore, existing purpose-built student accommodation in areas of overconcentration in the borough have been recently developed, and therefore it is not envisioned they would require repurposing during the course of the plan period. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-021	Watkin Jones		Reg19-E-021/011	Homes	H8 Purpose-built student accommodation			2	3.189		Blank	Blank						Blank	'Over-saturation' The concept of over-saturation is raised in **Part 2**. Paragraph 3.189 refers to "potential over-saturation" but does not state that this is a matter that exists currently in any locations in the Borough. If this does occur (with reference to the unjustified over-saturation criteria) the Plan should set out evidence to demonstrate harm occurring. Equally paragraph 3.189 warns against the potential for student accommodation to "undermine the delivery of general needs housing" but also does not provide evidence that this is actually occurring to date. Without such evidence the principle of "regulating" the delivery of PBSA (ref paragraph 3.190) is unnecessary and therefore unsound. Notably, at page 234, the justification text accepts that "over-saturation" would become acceptable to the Council in principle, if a nomination agreement existed for the proposed accommodation. This clearly suggests that the matter is not necessarily about infrastructure capacity or housing mix, but perhaps one around the confidence of proven need for the proposed accommodation. The practical application of the draft Policy uses a definition of over-saturation which refers only to the Plan period delivery records, without any reference to existing baseline data related to housing mix in an area. This latter data point must clearly be relevant when considering saturation. The Council should provide evidence of how the use of 800 beds and 300m has been arrived at given the lack of any evidenced "saturation" to date.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation', how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the

																						borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan. [...] [Policy H8 Implementation text - ALL section] This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved~~

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																					~~development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**
Reg19-E-021	Watkin Jones		Reg19-E-021/014	Homes	H8 Purpose-built student accommodation				3	3.190	Blank	No						Blank	<u>Affordable Student Accommodation</u> In respect of Part 3 of the draft Policy, there is no evidence to support the specific need for 60% affordable student accommodation. The Local Plan Viability Report (April 2024) prepared by BNP Paribas does not provide justification or explanation as to why the approach advocated / supported. This would be the highest policy expectation for affordable student accommodation in the UK as far as we are aware. We are not aware of any student accommodation projects that have ever delivered such provision and we therefore question whether this is a proactive plan policy or a measure to discourage student accommodation investment within the Borough given the Council's preference for alternative residential tenures. Paragraph 3.190 only briefly mentions the matter. The justification text on p233 equally offers nothing further beyond the headline policy. This aspect remains unjustified and therefore unsound.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. It should also be noted that Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-021	Watkin Jones		Reg19-E-021/015	Homes	H8 Purpose-built student accommodation						No	Blank						Blank	Nominations Agreements The London Plan recognises that is a demand for PBSA across London and that students may not live within the borough where they study. This is also recognised within para 6.125 of the Council's SHMA which states "in London it is common for students to attend a university in one Borough while residing in a different one". Whilst there is a significant and increasing need for PBSA in Stratford, and it is thus likely that new PBSA provided within the borough will be occupied by students studying in Stratford, the approach advocated within draft Policy H8(3) is not in conformity with the London Plan. WJG encourages the Council to remove this element of the policy and replicate the cross London approach advocated by the London Plan. Paragraph 4.15.3 of the London Plan states: "The strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period with changes in higher education providers' estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding. … There is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed."		We did not consider this change to be necessary as the approach to nominations agreements is justified, ensuring we support HEIs who are currently located in areas of overconcentration. In these locations the Council is seeking to limit speculative purpose-built student accommodation developments more broadly to make sure we don't undermine meeting our priority housing needs. Stronger nomination agreement requirements ensure that in areas of over-concentration nomination agreements prioritise meeting the housing needs of existing HEIs in the borough. In areas not subject to over-concentration, requirements align with the policy of the London Plan to meet wider accommodation needs. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student

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																					accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

Reg19-E-021	Watkin Jones		Reg19-E-021/016	Homes	H8 Purpose-built student accommodation			4			Blank	Blank						Blank	Furthermore in Part 4, requiring a Nominations Agreement for all PBSA assumes that all HE institutions have the commercial ability to commit to long term accommodation contracts. Such an approach favours certain institutions who have stronger balance sheets over others, which is likely to evolve further during the Plan period. This should not be a requirement for student accommodation proposals given the benefits that 'direct let' accommodation can also provide to local communities and HE institutions. Nomination Agreements are increasingly being seen by LPAs as a reflection of housing need, however it is just one indicator. Affordable housing would still be accepted in principle and promoted by LPAs even without a Housing Association providing full support at the planning stage. Therefore the policy should offer greater levels of flexibility if the Council is going to genuinely support this form of specialist housing accommodation. Finally, given the requirement for written support, the LPA should not expect HE institutions to attend pre-meetings as set out on p234. P234 of the draft Plan includes the following: "Where purpose-built student accommodation is being delivered within or adjacent to an existing campus development in the borough in accordance with H8.1.a or H8.2.d, the policy requires the nominations agreement to be secured for occupation by students of the higher education provider that the development is located is within or adjacent to". It is considered that this is unnecessary and unreasonable. It should be equally acceptable that the accommodation might also be acceptable to other HE institutions. It cannot be a requirement for a commercial contract to be in place just because of proximity. We accept that this would be desirable and therefore the word "required" to "prefers".		A change to this policy approach has not been made. We did not consider this change to be necessary as relaxing the wording would weaken our position to provide purpose-built student accommodation that helps meet the need of HEIs in Newham. The majority of Newham's Higher Education offer is provided by larger HEIs, namely the University of East London and University College London. The policy therefore seeks to positively meet need generated by these institutions. This requirement is also only applicable in areas of over-concentration, where nomination agreements are needed to help provide housing need of HEIs in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. The Council recognises the importance of ensuring the Plan is positively prepared in line with the London Plan and associated planning guidance, which refers to this concept as over-concentration. To better align with the Purpose-built Student Accommodation London Plan Guidance and to ensure clarity with regards to approved developments, the Council has therefore drafted the following modification, which will be presented to the Inspector for their consideration,: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or**

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																					approved campus development in the borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

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Reg19-E-021	Watkin Jones		Reg19-E-021/017	Homes	H8 Purpose-built student accommodation			5			Blank	Blank						Blank	Facilities within PBSA Part 5 of draft Policy H8 refers to sporting facilities. This is a very unusual expectation of PBSA as a specialist form of housing in which studying and socialising spaces are common. There is no clarity of why or what type of sporting accommodation would be appropriate.	This phrase should be deleted or replaced by "socialising". Needs for wider infrastructure such as sporting matters can be addressed by university provision, and/or the applicable CIL contribution locally.	The policy approach is justified by seeking to protect existing community facilities and health facilities from pressures associated with significant increases of population in the local area. Newham's wide range of community facilities are an essential element of its neighbourhoods, helping to support the needs of people living and working in the borough. The policy will help relieve pressure on local social infrastructure for study and exercise, while ensure students have access to available quality exercise and study spaces. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/001b	General	H8 Purpose-built student accommodation						Blank	Blank						Blank	Recent reports from CBRE state that London is home to around 400,00 full time students, the largest student population in the UK. However, there are only just over 100,000 PBSA beds. Demand for PBSA beds have grown by nearly 20% over the last decade, demonstrating a significant imbalance with supply. Newham's largest higher education institution is the University of East London (UEL). According to the Council's Strategic Housing Market Assessment (SHMA, 2022), UEL has 15,365 full time students in the 2020/21 academic year. Additionally, other higher education providers are introducing new campuses to Newham, namely around the Olympic Park. This includes an additional 4,000 students from UCL and 5,000 students from London College of Fashion, Loughborough University London and Staffordshire University London. Overall, as of 2023, the SHMA states that over 25,000 full time students will be studying in Newham. It also predicts that in response there will continue to be significant growth in the number of students living in the private rented market and therefore increased pressure on the housing stock.		Comment noted.

Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/002a	Homes	H8 Purpose-built student accommodation			H8.1 & H8.2			Blank	Blank						Blank	Policy H8 – Purpose-built student accommodation Parts 1 and 2 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-saturation of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing campus development in the borough. Unite make the following comments on Parts 1 and 2 of Policy H8: 1. Parts 1a and 2a of Policy H8, as well as Paragraph 3.188 of the supporting text, which states "the policy seeks to prevent additional student housing delivery in the Stratford and Maryland neighbourhood unless linked to a campus-based expansion" aim to limit the locations of PBSA development, in turn significantly limiting the development of PBSA as a whole. This is contrary to The London Plan (2021) Policy H15 (Purpose-built student accommodation), which encourages the development of student accommodation. There are also no locational constraints advised in the NPPF. 2. PBSA is widely recognised in national policy to contribute towards housing supply and is therefore considered a form of housing. National Planning Practice Guidance (NPPG) states the following (Paragraph: 034 Reference ID: 68-034-20190722) "All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply." The Housing Delivery Test Rulebook explains that this contribution is on a 2.5 bedspace to dwelling ratio. 3. A recent planning decision by Haringey Council (LPA ref. HGY/2023/2306 & HGY/2023/2307 at 'Printworks' 819-829 High Road, Tottenham, London, N17 8ER) granted approval for a PBSA scheme and acknowledged that the London PBSA market currently does not come close to providing the amount of accommodation required to house London's students, with c.310,000 students having to find accommodation outside of this purpose-built sector. The committee report references the supporting text of Policy H1 of the London Plan, stating	Recommendations On the basis of the above comments, Unite make the following recommendations to better align with the London Plan: • Remove the locational limits on PBSA from the Policy in order to align with where demand for PBSA lies. [• Remove the unviable requirement for replacement facilities to provide no net increase in beds. • Remove reference to over-saturation as there is no robust evidence provided to support this requirement.]	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or**

"… non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. The proposed scheme would therefore deliver 114 new homes (net gain of 101 homes) based on this ratio. As such, the loss of the existing 13 homes would be acceptable in principle given the uplift and net gain of 101 homes."

4. It is therefore clear that councils across London are adopting the approach set out in The London Plan and NPPG and accepting that PBSA is a contributor towards housing supply. On this basis, proposals for PBSA should not be limited to or prevented from being developed in certain locations as this limits PBSA's ability to contribute towards the borough's housing supply targets.

approved campus development in the borough.

3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.

4. New purpose-built student accommodation should:

a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or
b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and
c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to.

5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need.

6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

[...]

[Policy H8 Implementation text - ALL section] This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be:
• over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or
• a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student~~

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																					~~accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**
Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/002b	Homes	H8 Purpose-built student accommodation			H8.1 & H8.2			Blank	Blank						Blank	5. Additionally, it should also be acknowledged the role that PBSA has to play in relieving the pressure on the overall housing market. It is an accepted principle that the fewer PBSA bedspaces that are available, the greater the number of students occupying HMOs, the more demand for HMOs increases and the quicker the HMO market expands. The provision of additional PBSA bedspaces will therefore reduce this demand and the rate at which housing stock is converted to HMOs. This is recognised in NPPG, which states that ""encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock" (Paragraph: 004 Reference ID: 67-004-20190722).	Recommendations On the basis of the above comments, Unite make the following recommendations to better align with the London Plan: • Remove the locational limits on PBSA from the Policy in order to align with where demand for PBSA lies. [• Remove the unviable requirement for replacement facilities to provide no net increase in beds. • Remove reference to over-saturation as there is no robust evidence provided to support this requirement.]	A change to this policy approach has not been made. We did not consider this change to be necessary as Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/002c	Homes	H8 Purpose-built student accommodation			H8.1 & H8.2			Blank	Blank						Blank	6. With regards to Parts 1B and 2D, these parts of the Policy allow for PBSA development when "it is solely providing a replacement facility with no net increase in bed spaces". This requirement does not allow for viable development. Part H8.1 of the Policy implementation section provides furth detail stating that "Replacement accommodation should only re-provide the same number of bedrooms as the existing development and should not result in a net increase of student bed spaces". In circumstances where outdated accommodation and amenities are required to be redeveloped to meet market trends and updated student needs this is likely to be unviable without the provision of additional bedspaces. Additionally, where the student population of Newham is expected to continue growing as demonstrated above, additional PBSA bedspaces will be required to be developed to meet this demand and relieve pressure of the housing stock. Thus, where it is possible for this demand to be met through redeveloping land already in use as PBSA, this should be encouraged rather than prevented as it leaves other land available for other kinds of development. This requirement also does not align with and goes beyond the requirements of the London Plan (2021).	[Recommendations On the basis of the above comments, Unite make the following recommendations to better align with the London Plan: • Remove the locational limits on PBSA from the Policy in order to align with where demand for PBSA lies.] • Remove the unviable requirement for replacement facilities to provide no net increase in beds. [• Remove reference to over-saturation as there is no robust evidence provided to support this requirement.]	A change to this policy approach has not been made. We did not consider this change to be necessary as relaxing the wording would weaken our position to provide purpose-built student accommodation that helps meet the need of HEIs in Newham. Furthermore, existing purpose-built student accommodation in areas of overconcentration in the borough have been recently developed, and therefore it is not envisioned they would require repurposing during the course of the plan period. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/002d	Homes	H8 Purpose-built student accommodation			H8.1 & H8.2			Blank	Blank					Blank	7. Part 2c of the Policy refers to "an over-saturation of purpose-built student accommodation". The 'ALL' section of the Policy implementation text goes on to define 'over-saturation' as follows: "This policy will seek to monitor over-saturation of student bed spaces in each neighbourhood. For the purposes of this policy, over-saturation of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing being located within a radius of 300 metres from an existing purpose built student accommodation site or approved development." The text provides no explanation to demonstrate how these thresholds have been calculated, what these figures have been based on and that an exceedance of these figures could be defined as an 'over-saturation'. 8. The Policy and supporting text also provide no evidence to show that development that exceeds these thresholds, and therefore triggers 'over-saturation' would lead to any adverse impacts. 9. There is no tangible evidence to suggest that concentrations of PBSA cause harm to the balance or mix of uses in an area, cause additional pressure on local infrastructure or harm local communities. The assumption that concentrations of university students are liable to give rise to residential amenity issues to neighbours and be detrimental to the cohesiveness of communities is discriminatory and a distorted generalisation of a single category of people. Assuming that all students disrupt residential amenity or harm community cohesiveness oversimplifies the diversity of student experiences and behaviours and neglects the fact that individuals of all ages can contribute positively to their surroundings. 10. The PBSA market is mature and well-managed. Considerations of over-concentration conflates PBSA development with uncontrolled HMO accommodation, which is a markedly separate housing product and is entirely unjustified. Indeed, it is important to note that PBSA developments are managed buildings with staff on-site rather than uncontrolled HMO houses or flats, and thus considerations of amenity for these two distinct accommodation types should be treated separately. PBSA developments are subject to Student Management Plans which outline processes for the protection of surrounding residential amenity. There is no evidence or justification provided that PBSA actually creates harm to residential communities. 11. On the contrary, Unite argue that the provision of PBSA in fact contributes to the creation of mixed and balanced communities rather than harms existing	[Recommendations On the basis of the above comments, Unite make the following recommendations to better align with the London Plan: • Remove the locational limits on PBSA from the Policy in order to align with where demand for PBSA lies. • Remove the unviable requirement for replacement facilities to provide no net increase in beds.] • Remove reference to over-saturation as there is no robust evidence provided to support this requirement.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery, and where a significant amount of new purpose-built student accommodation has already been built or approved to meet need. The thresholds have been informed by London-based appeal decisions on similar issues. It is noted the appeal decisions highlighted in paragraph 12 relate to population; this is separate to the rationale behind the thresholds for Policy H8, which seek to better manage the finite land available in the borough to meet both Newham and London's housing needs. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. These locations can effectively support these densely occupied forms of development without undermining the Council's ability to meet our largest housing needs, and are most accessible to a range of users. They have better public transport and infrastructure in place to manage large congregations of people, as well as a range of facilities that people need (and can benefit from) in the course of a single trip. In turn, there is also is the opportunity for centres to benefit from the additional spend and investment generated from increased numbers of people, and the multiple benefits highlighted in this comment. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported

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																					residential management plan. [...] [Policy H8 Implementation text - ALL section] This policy will seek to monitor over-saturationconcentration of student bed spaces in each neighbourhood. For the purposes of this policy, over-saturationconcentration of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing, including existing or approved purpose built student accommodation sites, being located within a radius of 300 metres from the proposal site an existing purpose built student accommodation site or approved development. In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis. For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'. For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.

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Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/003	Homes	H8 Purpose-built student accommodation			H8.3			Blank	Blank						Blank	[Policy H8 – Purpose-built student accommodation] Part 3 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. Unite make the following comments on Part 3 of Policy H8: 1. The London Plan Policy H15 requires 35% affordable student accommodation (or 50% where the development is on public land or industrial land appropriate for residential sues). Part 3 of Policy H8 requires at least 60% from all new PBSA, which is a significant increase on the requirement set by the London Plan. 2. Neither the Policy nor the supporting text provide any robust justification for this increased requirement and deviation from the London Plan. 3. The increased affordable student accommodation contribution will have a detrimental impact on the viability and deliverability of student schemes in the London Borough of Newham. 4. This will also have wider implications for PBSA delivery in the borough and the PBSA market as a whole. Developers are likely to choose to avoid developing in Newham, which will hinder the borough's ability to keep up with the demand for PBSA, placing additional pressure on the private rented sector, exacerbating HMO growth and negatively impacting the overall housing stock and targets. 5. Any schemes that remain viable will then prioritise student bedspaces over the provision of communal amenity space and alternative uses to enhance viability. Furthermore, their capability to make other planning contributions (e.g. for open space) will be reduced.	Recommendations On the basis of the above comments, Unite make the following recommendation to again better align with the London Plan: • Reduce the affordable housing contribution to 35% (increasing to 50% in the defined circumstances) to align with the London Plan requirements.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. It should also be noted that Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/004	Homes	H8 Purpose-built student accommodation			H8.4b & H8.4c			Blank	Blank						Blank	[Policy H8 – Purpose-built student accommodation] Part 4b and 4c b. in areas of over-saturation, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located is within or adjacent to. Unite make the following comments on Parts 4b and 4c of Policy H8: 1. As above, with regards to 'over-saturation' there is no robust justification for the definition provided or any evidence that increased concentrations of PBSA can lead to adverse impacts. As all references to 'over-saturation' should subsequently be removed, the separate nomination requirements for these areas should in turn be removed. 2. Notwithstanding the above, the requirement for all bedrooms to be secured through a nominations agreement in the specified areas is a deviation from London Plan Policy H15, which only requires the majority of rooms to secured through these agreements for all developments in all areas. 3. The London Plan also does not specify that nominations agreements should be linked to the University that the development lies adjacent to. Thus, Unite consider these to be onerous requirements.	Recommendations On the basis of the above comments, Unite make the following recommendations to remove requirements beyond those in the London Plan: • Remove Part b in its entirety as it is a deviation from London Plan requirements and refers to areas of 'over-saturation' which cannot be justified. • Remove Part c of the Policy as this requirement goes beyond those included in the London Plan.	We did not consider this change to be necessary as the approach to nominations agreements is justified, ensuring we support HEIs who are currently located in areas of overconcentration. In these locations the Council is seeking to limit speculative purpose-built student accommodation developments more broadly to make sure we don't undermine meeting our priority housing needs. Stronger nomination agreement requirements ensure that in areas of over-concentration nomination agreements prioritise meeting the housing needs of existing HEIs in the borough. In areas not subject to over-concentration, requirements align with the policy of the London Plan to meet wider accommodation needs. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. The Council recognises the importance of ensuring the Plan is positively prepared in line with the London Plan and associated planning guidance, which refers to this concept as over-concentration. To better align with the Purpose-built Student Accommodation London Plan Guidance and to ensure clarity with regards to approved developments, the Council has therefore drafted the following modification, which will be presented to the Inspector for their consideration: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility

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																					with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

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Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/005	Homes	H8 Purpose-built student accommodation			H8.5			Blank	Blank						Blank	[Policy H8 – Purpose-built student accommodation] Part 5 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. Unite make the following comments on Part 5 of Policy H8: 1. Whilst PBSA developments are expected to provide sufficient amenity space, additional requirements for sports facilities on site are onerous and go beyond the requirements of other borough's PBSA policies within London and the London Plan. 2. Requirements for such facilities should be dealt with on a case-by-case basis, taking into consideration other sport facilities in proximity to the site not just those on campus and whether the site is suitable or has the capacity to provide such facilities.	Recommendations On the basis of the above comments, Unite make the following recommendation to allow for greater flexibility: • Remove the requirement for all sites to provide sports facilities and instead consider this on a site-by-site basis.	The policy approach is justified by seeking to protect existing community facilities and health facilities from pressures associated with significant increases of population in the local area. Newham's wide range of community facilities are an essential element of its neighbourhoods, helping to support the needs of people living and working in the borough. The policy will help relieve pressure on local social infrastructure for study and exercise, while ensure students have access to available quality exercise and study spaces. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-063	University of East London	DP9	Reg19-E-063/004	Homes	H8 Purpose-built student accommodation			1			Blank	Blank						Blank	Draft Policy H8: Purpose-Built Student Accommodation ('PBSA') The wording of Draft Policy H8 notes that new purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where a) It is located within or adjacent to an existing campus development in the neighbourhood; or b) It is solely providing a replacement facility with no net increase in bed spaces.	Noting similar comments with regards to policy that asks similar demands for PBSA located outside of these neighbourhoods (added text regarding ensuring there is not an over-saturation), UEL would wish to comment that the text requiring new PBSA to be a replacement facility with no net increase in bed spaces should be removed as it is too onerous.	A change to this policy approach has not been made. We did not consider this change to be necessary as relaxing the wording would weaken our position to provide purpose-built student accommodation that helps meet the need of HEIs in Newham. Furthermore, existing purpose-built student accommodation in areas of overconcentration in the borough have been recently developed, and therefore it is not envisioned they would require repurposing during the course of the plan period. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-063	University of East London	DP9	Reg19-E-063/005	Homes	H8 Purpose-built student accommodation			1			Blank	Blank						Blank	[Draft Policy H8: Purpose-Built Student Accommodation ('PBSA')] Further, part 1 of this policy should be expanded to include reference to UEL's Docklands Campus for which it is considered that further student accommodation to support the campus may be appropriate.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as part 1 support the development of all campuses across the borough. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the definition of the term 'campus'. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

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Reg19-E-063	University of East London	DP9	Reg19-E-063/006	Homes	H8 Purpose-built student accommodation			3			Blank	Blank						Blank	[Draft Policy H8: Purpose-Built Student Accommodation ('PBSA')] Draft Policy H8 also sets out that new purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021 and that developments for purpose built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. UEL consider that this target of 60% to be excessive and should therefore be reduced, particularly where PBSA proposals are being brought forward directly by Higher Education Providers. As presently worded, the requirement to deliver 60% affordable would have a significant impact on the future viability and delivery of PBSA within the borough. It is considered also that there should be provision built in to ensure that such a stringent level of affordable accommodation should not be required if the PBSA is being applied for by a higher educational establishment and/or directly nominated to such an establishment. UEL is conscious that they are building to meet demand, but such a policy would still require a high level of affordable student housing nonetheless.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-065	Stratford Original BID		Reg19-E-065/003	Homes	H8 Purpose-built student accommodation						Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - Balancing the student accommodation footprint to the town centre. We have seen an increased number of units in a very short period. The impact of a specific type of development seems to have not been considered and how this could be better integrated in the existing community, including the business community.		The policy approach is justified by seeking to protect existing community facilities and health facilities from pressures associated with significant increases of population in the local area. Newham's wide range of community facilities are an essential element of its neighbourhoods, helping to support the needs of people living and working in the borough. The policy will help relieve pressure on local social infrastructure for study and exercise, while ensure students have access to available quality exercise and study spaces. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/104	Homes	H8 Purpose-built student accommodation														No comment.		Comment noted.

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Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/027	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	We welcome the support for new purpose-built student accommodation in the Stratford and Maryland neighbourhood, which reflects the estimated 10,000 new students studying in the area once the UCL East and UAL campuses are fully open.		Support noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/028	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	As with the Policy H3, the affordable student accommodation requirement of 60% of bedrooms is unsound with the 35% in the London Plan (Policy H15) and should be consistent with the London Plan. The policy would then align with Policy H10 of the London Plan which sets targets for affordable rented homes but allows flexibility for other tenures including intermediate and market housing.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/029	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	Student need also derived across a London wide basis and set out in the London Plan and therefore, linking nominations to adjacent institutions in Part 4 of the policy would reduce flexibility and be contrary to the London wide need basis of the London Plan and should be removed.		We did not consider this change to be necessary as the approach to nominations agreements is justified, ensuring we support HEIs who are currently located in areas of overconcentration. In these locations the Council is seeking to limit speculative purpose-built student accommodation developments more broadly to make sure we don't undermine meeting our priority housing needs. Stronger nomination agreement requirements ensure that in areas of over-concentration nomination agreements prioritise meeting the housing needs of existing HEIs in the borough. In areas not subject to over-concentration, requirements align with the policy of the London Plan to meet wider accommodation needs. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student

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																					accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/021	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	[Appendix 2 - Representations Part 1] GL welcome the support for new purpose-built student accommodation within Stratford. Part 1 states that new purpose-built student accommodation in Stratford will only be supported where it is located within or adjacent to an existing campus development or it is solely providing a replacement facility with no net increase in bed spaces. Should alternative proposals for student accommodation be put forward on the remaining development plots at East Village, this would hinder the delivery of new development, despite the principle of student accommodation being recently accepted and approved on Plot N16.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding a lack of clarity around what was meant by the term 'adjacent'. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough.

																					3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan. [...] [Policy H8 Implementation text - ALL section] This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student**

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																					accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis. **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/022	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	[Appendix 2 - Representations Part 1] As per our above comments on Policy H3, the affordable student accommodation requirement of 60% of bedrooms is unsound as the Policy H15 in the London Plan sets this at 35%. The 60% level is also not supported by the BNPP viability assessment.	Policy H3 should be amended to be consistent with the London Plan.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/023	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	[Appendix 2 - Representations Part 1] The need for student accommodation is on a London-wide basis as set out in the London Plan (Paragraph 4.15.2).	Part 4c seeks to link nominations to adjacent institutions. This would reduce flexibility and be contrary to the London-wide need basis set out in the London Plan. Part 4c should be removed from Policy H8.	We did not consider this change to be necessary as the approach to nominations agreements is justified, ensuring we support HEIs who are currently located in areas of overconcentration. In these locations the Council is seeking to limit speculative purpose-built student accommodation developments more broadly to make sure we don't undermine meeting our priority housing needs. Stronger nomination agreement requirements ensure that in areas of over-concentration nomination agreements prioritise meeting the housing needs of existing HEIs in the borough. In areas not subject to over-concentration, requirements align with the policy of the London Plan to meet wider accommodation needs. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student

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																					accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/013	Homes	H8 Purpose-built student accommodation						Blank	Blank						Blank		[In addition to the what has been set-out above about FVA's and their use in reducing housing which our communities' most need, we also want to bring the following to your attention:] H8: Purpose-built student accommodation - New purpose-built student accommodation should only be built when there is a demonstratable need.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation', how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the

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																					~~development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/021	Homes	H8 Purpose-built student accommodation														Policy H8: Purpose-built student accommodation (PBSA) Whilst Hadley supports the requirement for new PBSA to be located in a Town Centre location with a minimum PTAL 4, it is considered inappropriate to limit the provision on new PBSA in the Stratford and Maryland neighbourhood if it is solely providing a replacement facility with no net increase in bed spaces within or adjacent to an existing campus development in the neighbourhood. As clearly stated in Policy H.4: Providing student accommodation of the LLDC Local Plan, provision of PBSA should "be directed to appropriate locations within or on the edge of the Metropolitan Centre". Stratford Town Centre is the most sustainable location for PBSA in the borough, so the DSLP should not seek to prevent the provision of new PBSA in the neighbourhood. Hadley is disappointed that the concerns raised regarding the restrictive nature of PBSA development in the Stratford and Maryland neighbourhood have not resulted in changes to the proposed wording of this policy. IQLN is proposed to deliver a balanced mix of PBSA and residential uses across the site, reflecting evidenced demand and an appropriate mix for its location. Hadley therefore suggests that at a minimum, PBSA in this location should be supported where it is delivered alongside and supports the delivery of housing. While it is recognised that the policy now allows delivery of PBSA in the neighbourhood where it is within or adjacent to an existing campus development, this is not flexible enough to meet the needs of universities in the area that are unable to provide the necessary accommodation for their students within or adjacent to their existing campus. PBSA in an accessible location that is a short journey by walking, cycling or public transport to existing campuses should be supported as suitable locations for PBSA, particularly where this is located closer to amenities than the campus.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or**

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Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/022	Homes	H8 Purpose-built student accommodation														[Policy H8: Purpose-built student accommodation (PBSA)] Hadley agrees with the changes to nominations agreements with higher education providers to not have to be located in Newham. This approach is more consistent with Policy H15 of the London Plan and better reflects the sustainability and accessibility of Newham's town centres as suitable locations for London's students to live in. However, the requirement to secure all bedrooms within a development in 'areas of over-saturation' through a nomination agreement is not supported. This is not in line with the London Plan and does not reflect how some students would prefer to live with people from different universities or in different locations.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the approach to nominations agreements is justified, ensuring we support HEIs who are currently located in areas of overconcentration. In these locations the Council is seeking to limit speculative purpose-built student accommodation developments more broadly to make sure we don't undermine meeting our priority housing needs. Stronger nomination agreement requirements ensure that in areas of over-concentration nomination agreements prioritise meeting the housing needs of existing HEIs in the borough. In areas not subject to over-concentration, requirements align with the policy of the London Plan to meet wider accommodation needs. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough.

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																					3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

Reg19-E-191	University College London	Deloitte	Reg19-E-191/009	Homes	H8 Purpose-built student accommodation													UCL welcomes the omission of the requirement for purpose-built student rooms to be secured through a nomination agreement with a Newham-based higher education provider. This had been stated in the Regulation 18 draft policy, and had been considered overly restrictive. UCL previously objected to the manner in which draft Policy H8: Purpose-built student accommodation prevented the provision of new purpose-built student accommodation in the Stratford and Maryland neighbourhood, unless such provision replaces an existing facility and results in no net increase in bed spaces. UCL notes that in setting out the changes made to the policy (page 85, 'Regulation 18 Consultation Report'), LBN explains that draft Policy H8 now "explicitly support[s] delivering existing campus development expansions in the Stratford and Maryland neighbourhood". Whilst UCL supports the amendment of the policy in this way, it is UCL's view that the restriction for proposals elsewhere in the neighbourhood to not result in net additional bed spaces remains unnecessarily restrictive. Whilst the Regulation 19 version of the draft Local Plan includes additional detail on the number of PBSA developments in the area in recent years, to prevent any net additional capacity entirely is considered excessive. Instead, it is argued that new proposals should be subject to the usual development tests, including those set out in the remainder of draft Policy H8 and as seen in the comparable adopted LLDC Policy H.4; namely that they are accessible by sustainable transport modes and from the higher education provider(s) to which the proposals are linked. In recognition that the draft Plan is to manage growth and development across the borough to 2038, draft Policy H8 does not allow the flexibility which may be required to accommodate demand across this period.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or**

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/052	Homes	H8 Purpose-built student accommodation							No							Policy H8: Purpose Built Student Accommodation 8.33 St William supports the acknowledgement of need for student housing in certain locations in the Borough. The London Plan sets an overall strategic requirement for PBSA of 3,500 bed spaces across London per year. Moreover, there are strong academic clusters in the Borough, and on the edge of its boundaries. 8.34 The London Plan (Policy H15) encourages the development of student housing in locations that are well-connected to local services by public transport and active travel, particularly in mixed-use regeneration and redevelopment schemes. 8.35 Part 2 of Policy H8 sets out the criteria for student accommodation in all other neighbourhoods outside Stratford and Maryland seeking to focus new student accommodation within or adjacent to an existing campus development or in a town or local centre location well connected by public transport. St William request that this part of the policy is updated to also consider locations in close proximity to town centres suitable as well. Sites immediately adjacent to town or local centres can equally benefit from high levels of public accessibility and should not be precluded.	[Appendix 12: General Policies – Suggested amendments] 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing campus development in the borough; or b. it is in **or close to** a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-saturation of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces, or it is located within or adjacent to an existing campus development in the borough.	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the approach to locating purpose-built student accommodation in town centres is justified. These locations can effectively support these densely occupied forms of development, and are most accessible to a range of users. They have better public transport and infrastructure in place to manage large congregations of people, as well as a range of facilities that people need (and can benefit from) in the course of a single trip. In turn, there is also is the opportunity for centres to benefit from the additional spend and investment generated from increased numbers of people. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should:

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Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/008	Homes	H8 Purpose-built student accommodation						No	No							Concerns about the provisions relating to Purpose Built Student Accommodation (PBSA), Build to Rent housing, affordable housing and housing mix in terms of the deliverability of these types of housing Draft Policy H8 (student housing) Draft Policy H8 (Purpose-built student accommodation) contains a requirement for new PBSA in Stratford and Maryland that is not providing a replacement facility to be "located within or adjacent to an existing campus development in the neighbourhood", in order to be supported. We have significant concerns with this requirement, which has the potential to overly constrain the supply of PBSA and does not reflect the established approach to the consenting of PBSA developments in the Stratford area. The significant need for PBSA in Stratford was acknowledged by LLDC officers in recommending approval for the Plot M2 development in July 2024 and accepted by LLDC's Planning Decisions Committee in it unanimous approval of the application. Relevant passages of the Committee Report are quoted below: 10.21. The Knight Frank assessment [submitted by URW as part of the planning application] sets out that there is a need for additional PBSA development in Stratford to cater for the needs of the emerging higher education institutions in the area, which are estimated to bring a total of 30,000 students to the Stratford area when fully operational in around ten years. 10.22. At present, a total of 3,570 student bedrooms in student accommodation schemes have been built out within the LLDC area and currently, 4,615 student bedrooms are proposed in consented planning permissions, some of which are under construction. If all student accommodation schemes are consented and built out, a total of 9,614 new student bedrooms would be provided within the LLDC area. 10.23. It is acknowledged that not all students would reside in PBSAs nor would all students studying in Stratford wish to reside in the local area, nevertheless applying the GLA methodology for assessing the need for PBSA the evidence suggests that there would be a need for specialist student accommodation locally. To that end, officers are satisfied that not only is there a strategic need which is being met given the expansion plans referred to above including HEI's there is also a local need.	Recommendation 3: Amend Draft Policy H8(1) to specify that net additional student accommodation is supported in the Stratford and Maryland neighbourhood, removing the requirement for it to be located within or adjacent to an existing campus. Suggested changes to wording of policy: H8 1: New purpose-built student accommodation in Stratford and Maryland neighbourhood will ~~only~~ be supported ~~where: a. it is located within or adjacent to an existing campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces.~~	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or**

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Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/010	Homes	H8 Purpose-built student accommodation						No	No								H8 3: New purpose-built student accommodation should provide at least **35** ~~60~~ per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/045	Homes	H8 Purpose-built student accomm odation														Homes Chapter Introduction Page 206 provides an introduction to future housing delivery within the borough and emphasises the need to deliver more homes; in particular affordable and family-sized homes. The need for specialist housing products is also included. The NPPF requires that housing needs of groups with specific housing requirements are addressed including the needs of students. NPPG 'Housing Needs of Different Groups' requires that "Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus … They will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements." The draft NPPF introduces further support for such forms of housing stating that mixed tenure sites, including housing designed for specific groups such as student accommodation, should be supported by local planning authorities through their policies and decisions. The London Plan at Para 4.1.1, the GLA's draft PBSA LPG and the GLA's PBSL guidance recognise the important role that these special forms of housing can make in increasing housing supply and supporting the London economy.	Similar emphasis should be set out in the Newham Local Plan (at page 206) to make clear that such forms of housing are welcome in the Borough in the right locations, in accordance with the London Plan and national planning policy and guidance	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan supports the delivery of purpose-built student accommodation, provided that it meets relevant policy requirements of the plan. These policy requirements seek to ensure that student accommodation is appropriately located, high quality and does not result in overconcentrations of purpose-built student accommodation delivery, which could have a negative effect on the Council's ability to deliver general needs homes. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/047	Homes	H8 Purpose-built student accommodation													It is clear that there are thousands of students living in the private rented sector at present (the Newham Strategic Housing Market Assessment (June 2022) confirms this), and this will increase further over time if PBSA is not built, and bearing in mind the growth in HEI's in the area. This housing product has the potential to take students out of the private rented sector and into PBSA, freeing up housing for the wider community. The more PBSA built, the higher the positive impact of this will be. PBSA should be encouraged in the right locations. The GLA's draft PBSA guidance at Para 2.5.4 also includes reference to the delivery of C3 affordable housing as part of mixed tenure schemes, where appropriate, and we note that draft policy seeks a similar approach. PBSA should be encouraged in the right locations as a key means of housing students and also delivering affordable housing. Specialist residential housing products such as PBSA have a crucial role to play in assisting boroughs in meeting housing needs which should be acknowledged at page 206. This benefit of PBSA should be better reflected throughout the plan		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery, and where a significant amount of new purpose-built student accommodation has already been built or approved to meet need. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or

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																					accommodation sites, being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/051	Homes	H8 Purpose-built student accommodation													Draft Policy H8: Purpose Built Student Accommodation Paragraph 3.188 states that the borough seeks to support the delivery of PBSA. Whilst we support Policy H8 in principle the wording of the policy is not supported, as it is overly restrictive and significantly exceeds the wording contained within London Plan Policy H15 There is a strong demand for PBSA across London and the London Plan had identified a requirement for 3,500 PBSA bedspaces per annum. Specifically, there is a strong demand for PBSA within Stratford, with the recent opening of the new UCL (East) campus and the London College of Fashion (UAL) campus within the Queen Elizabeth Olympic Park adding to the existing student population primarily from the University of East London. Alongside these representations we submit a Needs Assessment prepared by Cushman & Wakefield [Attachment: [302 - 312 High Street Stratford Student Need Assesment 20.12.2023]) which was prepared to support application ref. 23/00456/FUL. The assessment clearly demonstrates a considerable need for PBSA in Stratford/Newham more widely		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery, and where a significant amount of new purpose-built student accommodation has already been built or approved to meet need. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or

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																					accommodation sites, being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/053	Homes	H8 Purpose-built student accommodation														Indeed the Newham Strategic Housing Market Assessment (June 2022) – which is now rather dated – estimates that as a minimum there is an annual need for 210 beds (Para 6.127). At Paragraph 6.129 it notes that student numbers in Newham will increase by 60% with the opening of UCL (East) campus and the London College of Fashion (UAL) campus but doesn't go on to say what the annual number of PBSA beds will be to keep pace with this. Considering this 60% in student numbers this increase this could potentially require a further 126 units as minimum beyond the 210 equating to a need for 336 beds per annum.	These figures should be inserted into the sub-text to indicate that the Council accept there is need and have tried to plan for it.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is justified, referring to both the Strategic Housing Market Assessment and the significant levels of accommodation that have been permitted in the borough in recent years. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements and the levels of accommodation permitted in recent years can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/054	Homes	H8 Purpose-built student accommodation														Paragraph 6.130 of the assessment explains that "there has been and will continue to be a very significant growth in the number of students occupying private sector dwellings in Newham, which will have increased the pressure on the housing stock of the Borough particularly as there has also been a growth in households renting privately". Evidently, there is a strong demand for new PBSA in the borough owing to the expanding HEI's and to ensure that the pressure on the private renting housing stock from students is relieved. This forms the context for our response below		A change to this policy approach has not been made. We did not consider this change to be necessary as Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/055	Homes	H8 Purpose-built student accomm odation				H8.1										Part 1 of policy H8 states that: "New purpose-built student accommodation in Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces." The draft wording of Part 1 a. constrains the spatial location of new PBSA in Stratford and Maryland to being within or adjacent to an existing campus development in the neighbourhood. The term "adjacent" is ambiguous and unclear. It is also unclear what is meant by "campus". Many of the institutions in Stratford do not have campuses.		The Council's objective for this policy approach is to help address the housing need of HEIs in Newham without undermining the ability to meet Newham's largest housing needs, namely for affordable and family housing. However, the Council recognises the importance of ensuring the clarity of the Plan and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/056	Homes	H8 Purpose-built student accommodation													Whilst the premise of the draft policy to locate PBSA close to university buildings is recognised, this will significantly constrain the ability to find appropriate sites to meet the identified needs for PBSA. This draft policy wording is therefore not supported. The location of PBSA should be informed by assessments of supply and demand within a catchment area which allow the market to establish where new PBSA should be located, not just the adjacency to a HEI. Needs Assessments are typically based on catchment areas created by travel times to/from a location. London Plan Policy H15 Part B encourages PBSA in locations well-connected to local services by walking, cycling and public transport. The wording of the draft policy should reflect the London Plan In this respect, it would be better to reference specific town centre locations, or locations with high PTAL ratings etc., and/or in less than 30 min travel time to an HEI (other travel times may be considered appropriate depending on context). We would suggest that there are appropriate locations for PBSA that are not "in-centre" but are still well connected and suitably close to transport, services and facilities. The policy wording should be amended to create this flexibility and encourage supply in the right locations. This would have the effect of ensuring PBSA is in the right location for the students, and should also mean that the type of building created for PBSA is appropriate to its context i.e. in central areas, not in lower density suburbs.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery, and where a significant amount of new purpose-built student accommodation has already been built or approved to meet need. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. With regards to the policy limiting provision of accommodation to town centre locations, we consider these locations can effectively support these densely occupied forms of development, and are most accessible to a range of users. They have better public transport and infrastructure in place to manage large congregations of people, as well as a range of facilities that people need (and can benefit from) in the course of a single trip. In turn, there is also is the opportunity for centres to benefit from the additional spend and investment generated from increased numbers of people. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/059	Homes	H8 Purpose-built student accommodation			H8.1 b											It is unclear what Part 1b is trying to achieve. Part 1 b. does not allow for an increase in bedspaces at sites which already provide PBSA. This does not allow for the best use of previously developed land, a design-led approach, optimisation of development, or for the redevelopment of PBSA to meet identified needs. Most significantly, it is wholly unviable to redevelop a building to exactly the same capacity as the existing. We cannot find any evidence to support or justify this approach and recommend it is deleted. The wording of the policy is not in conformity with the London Plan or the NPPF.		A change to this policy approach has not been made. We did not consider this change to be necessary as relaxing the wording would weaken our position to provide purpose-built student accommodation that helps meet the need of HEIs in Newham. Furthermore, existing purpose-built student accommodation in areas of overconcentration in the borough have been recently developed, and therefore it is not envisioned they would require repurposing during the course of the plan period. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/060	Homes	H8 Purpose-built student accommodation			H8.2 a										Part 2 of the policy should also be redrafted because: For the reasons outlined above, Part 2a is not supported. This is too restrictive and will constrain supply.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery, and where a significant amount of new purpose-built student accommodation has already been built or approved to meet need. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. With regards to the policy limiting provision of accommodation to town centre locations, we consider these locations can effectively support these densely occupied forms of development, and are most accessible to a range of users. They have better public transport and infrastructure in place to manage large congregations of people, as well as a range of facilities that people need (and can benefit from) in the course of a single trip. In turn, there is also is the opportunity for centres to benefit from the additional spend and investment generated from increased numbers of people. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces.

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																					over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/061	Homes	H8 Purpose-built student accommodation			H8.2 b										2b is broadly supported and should actually apply to all PBSA not just those outside of Stratford and Maryland. It should be amended to be more flexible though, noting our points above.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery, and where a significant amount of new purpose-built student accommodation has already been built or approved to meet need. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. With regards to the policy limiting provision of accommodation to town centre locations, we consider these locations can effectively support these densely occupied forms of development, and are most accessible to a range of users. They have better public transport and infrastructure in place to manage large congregations of people, as well as a range of facilities that people need (and can benefit from) in the course of a single trip. In turn, there is also is the opportunity for centres to benefit from the additional spend and investment generated from increased numbers of people. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces.

																					2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan. [...] [Policy H8 Implementation text - ALL section] This policy will seek to monitor

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																					over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/062	Homes	H8 Purpose-built student accommodation			H8.2 c											2c is not supported as "over-saturation" is a negative term and is not defined, nor the consequences of over-saturation appropriately assessed and explained. There is no evidence to suggest what is the "right" level of PBSA in an area, or any evidence to suggest alternatives have been tested. This phrasing suggests a prejudice against student population and that they are "unwelcome". This is inappropriate. Equally, if policy directs students to a specific area such as Stratford, then clearly the amount of PBSA supply would increase in this location. This again supports our point that directing PBSA to Stratford and/or other town centres, and/or close to transport, amenities and services is a successful way of spreading out PBSA developments rather than having them all focussed in a small number of areas. If there is a harm of having a high number of students in a location (there's no evidence of this harm) then spreading students to these locations would mitigate that consequence.		The Council's objective for this policy approach is to ensure this type of accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, which includes student accommodation in well-connected town centre locations in the borough, balancing this provision with the need to deliver affordable and family-sized accommodation to meet our highest housing needs. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. However, the Council recognises the importance of ensuring the Plan is positively prepared in line with the London Plan and associated planning guidance, which refers to this concept as over-concentration. To better align with the Purpose-built Student Accommodation London Plan Guidance, the Council has therefore drafted the following modification, which will be presented to the Inspector for their consideration: This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/063	Homes	H8 Purpose-built student accommodation			H8.2 d											2d is not supported for the same reasons noted above.		A change to this policy approach has not been made. We did not consider this change to be necessary as relaxing the wording would weaken our position to provide purpose-built student accommodation that helps meet the need of HEIs in Newham.

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																					Furthermore, existing purpose-built student accommodation in areas of overconcentration in the borough have been recently developed, and therefore it is not envisioned they would require repurposing during the course of the plan period. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/064	Homes	H8 Purpose-built student accommodation			H8.3											Part 3 of the policy requires that new PBSA should provide 60% affordable student accommodation subject to financial viability assessment. Whilst the premise of seeking to maximise affordable student accommodation is supported, the provision of 60% (subject to viability) which is being proposed by the plan significantly exceeds the 35% requirement (via the Fastrack Route) as per the London Plan. A clear justification is therefore needed. The Local Plan Viability Assessment Evidence Base report makes no consideration of PBSA developments or their financial viability. As such, the 60% figure is not based on any evidence base or assessment of alternative scenarios. The majority of such proposals considered by the planning system in recent years would surely be found to be unviable should a 60% affordable student accommodation figure have been applied. The clear consequence of seeking 60% affordable student accommodation (subject to viability) is that PBSA developments will be discouraged from coming forward and so supply will be further constrained. For any schemes which may come forward it will also undoubtedly lead to protracted viability negotiations further delaying the provision of much needed PBSA. This is not positively planning for this housing type; this approach will hugely restrict supply. The GLA's draft PBSA LPG at para 2.5.4. considers this point, as does the draft NPPF at para 69. Rather than seeking to constrain supply, the Council should consider how it can help to deliver other plan objectives such as regeneration, housing delivery and affordable housing delivery.	Rather than this policy approach, we would suggest that the London Plan 35% minimum target for affordable student accommodation is introduced, alongside the option for developers to deliver C3 affordable housing instead of affordable student.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/067	Homes	H8 Purpose-built student accommodation			H8.4											Part 4 of the policy requires that new PBSA should: a. Secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-saturation, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located within or adjacent to.		Comment noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/068	Homes	H8 Purpose-built student accommodation			H8.4 a											Part a. accords with the London Plan and is agreed. The cascade mechanism set out in the Implementation section of the draft Plan at page 233 should a nominations agreement not be secured is agreed as it aligns with the GLA's draft PBSA LPG.		Support noted.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/069	Homes	H8 Purpose-built student accommodation			H8.4 b											Part b. goes significantly beyond the London Plan. A suggested definition of 'over-saturation' is set out in the Implementation section of the draft Plan at page 233. Whilst the efforts to quantify over-saturation are noted and seek to align with the GLA's draft PBSA LPG, the proposed definition is arbitrary and requires justification. Within the policy implementation, there is a lack of clarity as to what is meant by "net residential approvals and completions". Is this the number of permissions, habitable rooms, units or other? Secondly, limiting student developments to only 800 beds within 300m of existing PBSA is not effective, and is unjustified. What is considered to be an existing PBSA? Would a scheme of 799 beds be acceptable? Equally would 3 schemes of 500 beds be acceptable? For the reasons noted above, we are concerned with the language used in respect of "saturation" and do not consider it is the right approach to take. Impacts of student accommodation, if that is what the Council is concerned with, can be dealt with in a different way such as management plans, as partly outlined above. If the concern is about mixed and balanced communities, then again, the use of policy to encourage on site affordable housing, or a range of uses to be delivered through development should be considered.	This wording needs to be deleted and reconsidered based on evidence.	The Council's objective for this policy approach is to help address the housing need of HEIs in Newham without undermining the ability to meet Newham's largest housing needs, namely for affordable and family housing. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective in line with the London Plan and associated planning guidance, which refers to this concept as over-concentration. To better align with the Purpose-built Student Accommodation London Plan Guidance, and to clarify how overconcentration will be measured, the Council has therefore drafted the following modification, which will be presented to the Inspector for their consideration: This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/071	Homes	H8 Purpose-built student accommodation			H8.4 c											Part c. goes beyond the London Plan. It is appropriate for PBSA to seeks a nominations agreement with the higher education provider that the development is located within or adjacent to however should this not be possible alternative HEI's must be persuaded. The use of the word 'should' in the draft policy should be altered to 'in the first instance…'. The approach set out hands an unfair commercial advantage to the adjacent HEI which will again lead to a constrained supply.		We did not consider this change to be necessary as the approach to nominations agreements is justified, ensuring we support HEIs who are currently located in areas of overconcentration. In these locations the Council is seeking to limit speculative purpose-built student accommodation developments more broadly to make sure we don't undermine meeting our priority housing needs. Stronger nomination agreement requirements ensure that in areas of over-concentration nomination agreements prioritise meeting the housing needs of existing HEIs in the borough. In areas not subject to over-concentration, requirements align with the policy of the London Plan to meet wider accommodation needs. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student

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																					accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/072	Homes	H8 Purpose-built student accommodation			H8.4											Stratford and Maryland Neighbourhood The Site is located within the Stratford and Maryland Neighbourhood (Neighbourhood N8). The vision recognises that the neighbourhood will continue to benefit from high levels of growth including new housing and recognises the presence of the higher educational facilities.		Support noted.

Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/076a	Homes	H8 Purpose-built student accommodation													Furthermore the benefits that specialist housing products such as PBSA (and co-living) have in meeting housing needs must be more strongly acknowledged through wording which is more positive. Similarly, the draft wording stipulating the spatial location of these housing products is overly restrictive and should provide significantly greater flexibility than currently proposed to ensure identified needs can be met and to not hinder such development from coming forward.		The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery, and where a significant amount of new purpose-built student accommodation has already been built or approved to meet need. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or

																					d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan. [...] [Policy H8 Implementation text - ALL section] This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student**

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																					accommodation sites, being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/076b	Homes	H8 Purpose-built student accommodation														Furthermore, such developments should also not be hindered from coming forward by a requirement to deliver 60% affordable housing (subject to viability). We would suggest that the London Plan 35% minimum target for affordable student accommodation is introduced, alongside the option for developers to deliver C3 affordable housing instead of affordable student.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/009	Homes	H8 Purpose-built student accommodation			Part 2			Blank	No						Blank	Draft Policy H8: Purpose-built student accommodation Draft Policy H8 states "new purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-saturation of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing or permitted campus development in the borough". Newham has a rapidly growing student population with UEL increasing their number of students from 10,500 students in 2018/19 to an envisaged 30,000 students in 2028/29. There has also been a recent growth in other Newham based institutions such as UCL East (approx. 4,000 students), London College of Fashion (approx. 5,000 students), and Loughborough and Staffordshire University locating in the Borough. Further to the above, additional demand will be generated by the UTC's proposed expansion (LPA ref. 24/01280/FUL). RAD CHP Ltd.'s vision to create a new campus development will also generate demand. As noted, there is a live planning application for change of use of the existing c.14,000 sq.m, 9-storey Altitude Building on the RAD Phase 1 site to enable it to become a university building. Whilst there have been a number of PBSA schemes consented in the Stratford area and a resolution to grant on Plot 5 of RAD, this is reflective of the growth in students within the Borough. Students unable to access PBSA will either have to rely on their family home, or local HMOs. This puts stress on the wider housing market and private rented sector, and there has been a significant growth in rental homes being used by students in the Borough in recent years as emphasised in the Newham Strategic Housing Market Assessment (2022). We have concerns that this policy as drafted will unduly deter PBSA development and investment in the borough, with an approach not consistent with neighbouring boroughs or the London Plan. The London Plan (Policy H15) emphasises that Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed. The current policy wording does not address strategic need across London: whilst London has a large purpose built student housing market, it does not come close to providing the amount of accommodation required to house London's students, with approximately 317,000 students having to find accommodation outside of the private and university sectors, mostly in HMOs.	Further detailed concerns on this draft policy are summarised below. - We consider that the wording of part (a) of this policy needs to be clarified, in order to refer to both existing and "emerging" "planned" or "permitted" campus development in the borough. - As currently drafted, part (d) of this policy is open to misinterpretation. It is understood that 'oversaturation' is not applicable as a consideration if the PBSA is located within or adjacent to an existing or permitted campus development in the borough, however we request the wording is clarified to confirm this point. - The supporting text on p.233 also requires clarification when it refers to 800 student bedspaces being located within 300m of an existing or approved PBSA development resulting in oversaturation. We request the wording is made clearer to confirm that the 800 figure is bedspaces additional to, not inclusive of, those already approved/existing within 300m. The 800 beds also appears to be an arbitrary figure and it is not clear where this has come from and why for instance 900 or 1,000 beds within 300 metres from an existing PBSA site or approved development would be considered oversaturation, this is therefore not currently justified. - It is also considered that there should be adequate distinction in policy between 'new build' PBSA which occupies land which could otherwise be utilised for C3 housing, and repurposing of existing buildings for PBSA (as in the case of RAD, where the existing buildings are not suitable for C3 housing and PBSA represents a sustainable form of repurposing office floorspace).	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. It should be noted that Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or

																				The current policy wording also does not pay due respect to the London Plan's recognition that PBSA provides a valuable contribution to Borough and London-wide housing targets (at a ratio of 2.5:1).		b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan. [...] [Policy H8 Implementation text - ALL section] This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential

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																					approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**

Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/010a	Homes	H8 Purpose-built student accommodation			Part 3			Blank	No						Blank	[Draft Policy H8: Purpose-built student accommodation] Affordable Student Accommodation Part (3) of this policy states that new PBSA should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021, further stating that developments for PBSA that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. The London Plan requires 35 per cent affordable student accommodation at specific rental benchmarks. The 60 per cent is not sufficiently evidenced or justified, and is not consistent with the approach taken in neighbouring boroughs or the London Plan. The proposed 60 per cent in LBN specifically will be a significant deterrent for investors and developers. We consider this proposed policy will have the following detrimental effects: 1) On schemes which do deliver 60 per cent, the rents of the market homes will increase, making the non-affordable (market) bedspaces less accessible to a broad range of students. 2) Due to the deterrent effect and likely limited new PBSA in the borough, the market rents of existing developments serving the borough's HEIs will likely increase. 3) Due to the deterrent effect and likely limited stock of PBSA in the borough, the private rented sector and HMOs will continue to be utilised for student housing, occupying family-sized homes which are much-needed to provide general needs housing for people in LBN. In relation to the third point, Newham's Strategic Housing Market Assessment (2022) outlines that the number of private households with Class N Council Tax exemptions (solely used by students) is 917 and has nearly doubled since 2011. There has been and will continue to be a rapid increase in students within Newham with UEL increasing their number of students from 10,500 students in 2018/19 to an envisaged 30,000 students in 2028/29. There has also been a recent growth in other Newham based institutions such as UCL East, London College of Fashion, Loughborough and Staffordshire University locating in the Borough. The growth of these Universities will continue to put further pressure on the private rented market and therefore sufficient PBSA is needed to support this growth in students and any further growth on the RAD site.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. It should also be noted that Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/010b	Homes	H8 Purpose-built student accommodation			Part 3			Blank	No						Blank	The supporting text to this policy, which references the standard 'Letter of Support' approach at preapplication stage, is supported and reflects London Plan Policy so should be applied uniformly to all PBSA proposals in the borough. The supporting text's reference to a cascade mechanism for direct lets, should a nominations agreement not be secured by the point of first occupation, is supported and should be applied uniformly to all PBSA		We did not consider this change to be necessary as the approach to nominations agreements is justified, ensuring we support HEIs who are currently located in areas of overconcentration. In these locations the Council is seeking to limit speculative purpose-built student accommodation developments more broadly to make sure we don't undermine meeting our priority housing needs. Stronger nomination agreement requirements ensure that in

																				proposals in the borough. This confirms that the following hierarchy will be applied: – full-time higher-education students at local Higher Education Providers (HEP) (within Newham's borough boundary). – those at other London HEPs with good sustainable transport connections to the site. – any other higher-education student at a London HEP campus. – as a last resort, any other higher-education student with a need to reside in London.		areas of over-concentration nomination agreements prioritise meeting the housing needs of existing HEIs in the borough. In areas not subject to over-concentration, requirements align with the policy of the London Plan to meet wider accommodation needs. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built. The Council recognises the importance of ensuring the Plan is positively prepared in line with the London Plan and associated planning guidance, which refers to this concept as over-concentration. To better align with the Purpose-built Student Accommodation London Plan Guidance and to ensure clarity with regards to approved developments, the Council has therefore drafted the following modification, which will be presented to the Inspector for their consideration: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student

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																					accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.

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Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/019	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	[Key areas for further consideration are summarised below:] 3) The 60 per cent affordable student housing is considered to have detrimental knock-on effects, increasing market rents for PBSA in LBN, and putting stress on LBN's private rented sector, and should be reviewed as it is not considered to be consistent with the approach taken in the London Plan.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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. It should also be noted that Newham's article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/021	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	[Key areas for further consideration are summarised below:] 5) Clarification should be provided with regard to the oversaturation of PBSA draft policy wording.		The Council's objective for this policy approach is to ensure this type of accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, which includes student accommodation in well-connected town centre locations in the borough, balancing this provision with the need to deliver affordable and family-sized accommodation to meet our highest housing needs. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. However, the Council recognises the importance of ensuring the Plan is positively prepared in line with the London Plan and associated planning guidance, which refers to this concept as over-concentration. To better align with the Purpose-built Student Accommodation London Plan Guidance, the Council has therefore drafted the following modification, which will be presented to the Inspector for their consideration: This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/022	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	[Key areas for further consideration are summarised below:] 6) A more consistent approach should be taken to applications for PBSA, with regard to the required Letter of Support, GLA rental benchmarks, and Nominations Agreements.		We did not consider this change to be necessary as the approach to nominations agreements is justified, ensuring we support HEIs who are currently located in areas of overconcentration. In these locations the Council is seeking to limit speculative

purpose-built student accommodation developments more broadly to make sure we don't undermine meeting our priority housing needs. Stronger nomination agreement requirements ensure that in areas of over-concentration nomination agreements prioritise meeting the housing needs of existing HEIs in the borough. In areas not subject to over-concentration, requirements align with the policy of the London Plan to meet wider accommodation needs.

Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan.

With regards to the affordable student accommodation target, we did not consider this change to be necessary as we consider the proposed target to be positively prepared and justified.

The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, 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 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. The policy 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.

The Council is satisfied that the plan remains sound without the proposed changes.

However this policy approach also received comments which raised concerns regarding the term 'over-saturation' and the application of the policy to developments that have been approved but not yet built.

In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration:

1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where:
a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or
b. it is solely providing a replacement facility

																					with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an

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																					appropriately detailed and resourced residential management plan.

Reg19-E-234	Places for London		Reg19-E-234/034	Homes	H8 Purpose-built student accommodation						Blank	No						Blank	Draft policy H8, Part 2 seeks to restrict purpose-built student accommodation unless it is either located within or adjacent to an existing campus in the borough; or in a town centre location / local centre and benefit from a minimum Public Transport Access Level of 4. This is overly restrictive. London Plan Policy H15 requires boroughs to ensure that local and strategic need for purpose-built student accommodation is addressed whilst also ensuring mixed and inclusive neighbourhoods. It outlines that there is an overall strategic requirement for student accommodation in London (3,500 purpose-built bed spaces per annum). There is nothing in the London Plan which restricts student accommodation to sites within town centres or adjacent to existing University campuses. There is no evidence which justifies this position and therefore this approach must be considered unsound. We have a number of sites within Newham where student accommodation could be considered, with the potential for student accommodation to support overall scheme viability within mixed tenure and mixed use developments. These sites would be considered suitable locations for student accommodation in terms of the London Plan policy criteria, with good public transport access and relatively close proximity to nearby universities. However, not all of these sites would meet the restrictive requirement of needing to be either adjacent to an existing campus in the borough or within a town centre. The proposed policy approach would therefore significantly constrain the provision of purpose-built student accommodation, which is not justified or in line with the London Plan. The draft Local Plan should provide a criteria for assessing 'over saturation / concentration' issues on a site by site / area by area basis, as recommended by the London Plan and draft GLA guidance. This criteria based alternative approach does not seem to have been considered. In 2021/22 there were over 374,000 fulltime students in London – but with access to only 97,000 purpose-built student accommodation (PBSA). As a result, a high proportion of students (between 40-50%) are likely to be living in the private rented sector. East London is increasing attracting new Higher Education Institutes (including the UCL East Campus and various satellite campuses on the Isle of Dogs). These new HEIs, alongside established Universities – such as the University of East London, the University of Greenwich, Goldsmiths College – has led to growth in full-time students within east London. The draft NPPF 2024 para 69 notes that "Mixed tenure sites can provide a range of benefits including creating diverse communities and supporting timely build out rates and local planning authorities should support their development through their policies and decisions. Mixed tenure sites can include a mixture of ownership and	Our proposed modifications are below. This seeks to ensure general conformity with the London Plan and ensure a greater degree of flexibility: New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is in a town centre or local centre location **or is** well connected by public transport (with a minimum Public Transport Accessibility Level of 4); b. it will not create an over-saturation of purpose-built student accommodation;	The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the locational limits on purpose-built student accommodation seeks to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes, ensuring the plan is positively prepared to meet the borough's housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough. These locations can effectively support these densely occupied forms of development without undermining the Council's ability to meet our largest housing needs, and are most accessible to a range of users. They have better public transport and infrastructure in place to manage large congregations of people, as well as a range of facilities that people need (and can benefit from) in the course of a single trip. In turn, there is also is the opportunity for centres to benefit from the additional spend. Further information on the rationale behind our Purpose-build Student Accommodation policy requirements can be found in the Policy H8: Purpose-build Student Accommodation Topic Paper that supports the Submission Local Plan. The Council is satisfied that the plan remains sound without the proposed changes. However this policy approach also received comments which raised concerns regarding the term 'over-saturation', how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built. In light of these comments, the Council recognises the importance of ensuring the Plan is positively prepared and justified and has therefore drafted the following modification, which will be presented to the Inspector for their consideration: [Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing **or approved** campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an

																				rental tenures,……. as well as housing designed for specific groups such as older people's housing and student accommodation". We therefore consider that Newham should provide greater support for mixed forms of housing (including student housing) within site allocations close to town centres (particularly Canning Town) and public transport hubs.		existing **or approved** campus development in the borough; or b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-~~saturation~~**concentration** of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing **or approved** campus development in the borough. 3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-~~saturation~~**concentration**, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing **or approved** campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located ~~is~~ within or adjacent to. 5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing **or approved** student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need. 6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan. [...] [Policy H8 Implementation text - ALL section] This policy will seek to monitor over-~~saturation~~**concentration** of student bed spaces in each neighbourhood. For the purposes of this policy, over-~~saturation~~**concentration** of purpose built student accommodation in a neighbourhood or resulting from a

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																					development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing**, including existing or approved purpose built student accommodation sites,** being located within a radius of 300 metres from **the proposal site** ~~an existing purpose built student accommodation site or approved development~~. **In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.** **For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.** **For the purposes of this policy, 'campus' is defined as 'a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university'.**
Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/011	Homes	H8 Purpose-built student accommodation						Blank	Blank						Yes	This section does not seem to include anything about building affordable student accommodation for families. This is a particularly acute issue for international students who have come to the UK with their dependents. In the joint report INTERNATIONAL STUDENTS IN A POST PANDEMIC COST OF LIVING CRISIS: KNOWLEDGE EXCHANGE AND POLICY IMPLICATIONS by Kavita Datta (Queen Mary University of London), Rozina Iqbal (Newham Community Project) and Helena Taylor (Newham Council) cites housing as one of the key issues affecting international students in Newham. Many live in overcrowded conditions, in HMOs paying unaffordable rents and at risk of eviction if they miss a rent payment. A copy of this report has been attached to our joint submission.	We ask that the policy explicitly mentions students with families and specifically international students with dependents in this section and to consider allocating a percentage of family dwellings needed when considering planning applications for purpose-built student accommodation.	A change to this policy approach has not been made. We did not consider this change to be necessary as policy H4 seeks to meet the needs of families across the borough, including requiring a viability tested target for 40% of new residential units on major applications as family dwellinghouses. This requirement will help to address the housing needs of international students with dependents. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-243	Shelter and Newham Temporary Accommodation Action Group		Reg19-E-243/013	Homes	H8 Purpose-built student accommodation						Blank	Blank						Yes	[Appendix attached - INTERNATIONAL STUDENTS IN A POST PANDEMIC COST OF LIVING CRISIS KNOWLEDGE EXCHANGE AND POLICY IMPLICATIONS Joint report]		Comment noted. Policy H8 seeks to deliver well-located, quality purpose built student accommodation to meet the needs of students (including international students). It also requires the delivery of affordable student accommodation to meet housing need.

Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/024	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living														As a community we are also exploring purchasing properties to provide further move-on accommodation. The difficulty is the current block on establishing HMOs. This is understandable when these are designed purely to maximise income with poor management leading to anti-social behaviour and disruption to communities. However, with careful management and monitoring, bona fide charities such as NEWway should be able to buy and manage homes where three or four guests can be supported into independent living and permanent work. The current Article 4 restrictions means investing in property is capped to just two people per home, which makes this plan financially unviable. The finances also rely on Enhanced Housing Benefit rates- in turn increasing the Council burden and excluding the tenant from gainful employment- as the rent is tied to support and does not encourage paid work. By increasing tenant numbers in suitable homes and using Universal Credit (and salary) for the rent, the support to tenants can be provided in existing community projects, such as Bonny Downs and NEWway. Investors are interested in this model, and talks are already in progress. This model makes the support sustainable using community assets, it is person centred rather than financially-driven and removes the reliance on Housing Benefit costs. Again, this joint LBN/voluntary sector approach could really help many individuals flourish in independent living and reduce benefit and support costs.		A change to this policy approach has not been made. We did not consider this change to be necessary as our policies protecting family homes from conversion are positively prepared and justified by our evidence of housing need. The Plan already effectively balances the need to meet the need for family homes, as evidenced in the SHMA, and the need for temporary accommodation. The policy does set out some exceptional circumstances where conversion of family homes to smaller units will be acceptable, including where homes will meet the housing needs of homeless single people in Newham or people who are owed a homelessness duty by the Council, provided the conversion is for a temporary basis. The Council is satisfied that the plan remains sound without the proposed changes However, the Council recognises the importance of ensuring the Plan effectively meets the needs of the Council services who will be involved in housing people in the accommodation that meets the housing needs of homeless single people in Newham and has therefore made the following wording change to Policy H2, which is included in the modification table: 4. Development that results in the subdivision or conversion of a family dwellinghouse (C3) with three or more bedrooms to meet the housing needs of Newham Care Leavers or homeless single people in Newham or people who are owed a homelessness duty by the Council may be acceptable. In these circumstances, proposals will be given a temporary change of use planning permission of up to five years. Any application would be expected to be accompanied by evidence to demonstrate that the property would be used as: a. a house in multiple occupation (C4) for up to six sharers for sole use by Newham Care Leavers; or b. a house in multiple occupation for the sole use by Newham~~'s Temporary Accommodation service~~ **Council** for people who are owed a homelessness duty or single homeless people; and [...] This policy sets out an exception to allow for the conversion of family homes to houses in multiple occupation where housing is for the sole use by Newham Care Leavers or homeless single people in Newham or people owed a homelessness duty by Newham Council. Accommodation placements for these groups should be made directly by the London Borough of Newham, with the definition of 'Newham Care Leavers' set out in the Local Plan glossary. The policy requirement should be secured either via a time-limited planning permission or through a section 106 agreement. The mechanism for securing the

																					permission will be directed by the case officer for the application. Care leavers accommodation provided through this exception should be for up to six sharers. Accommodation for single homeless people in Newham or people owed a homelessness duty by Newham Council can either be designed as a house in multiple occupation (up to six sharers) or as a large house in multiple occupation (between seven and ten sharers). Conversions under this part are expected to meet the requirements of Policy H6 and Policy H9, including requirements for residential management plans and **agreed** ~~capped~~ rent levels. Proposals should also meet the relevant housing quality requirements of Policy H11 (see Table 13). To meet the requirements of this policy, the use of the housing specifically for Newham Care Leavers **or,** ~~,~~ homeless single people in Newham or people owed a homelessness duty by the London Borough of Newham should be included in the description for the planning permission, alongside the temporary period the planning permission is sought for. Applicants, as part of their planning submission, should provide evidence of discussions with Newham's ~~Temporary Accommodation~~**relevant commissioning** service**(s)**~~, and the Council's Children's commissioners where relevant~~ which show the length of time the accommodation will be required for. This will inform the length of time the temporary consent is granted for. Temporary periods for the use should be five years or fewer, and should have regard to the policy provisions for meanwhile uses set out in policy BFN1.8. Before submitting a planning application, Newham's ~~Temporary Accommodation service (who also help facilitate the housing of children leaving care)~~ **relevant commissioning service(s)** ~~and the Council's Children's commissioners, where relevant,~~ should be contacted by the applicant in order to confirm that the accommodation provision is appropriate and to confirm the rents proposed would be suitable (thereby demonstrating compliance with H9.2). This evidence should be submitted alongside the planning application. The Council's ~~Temporary Accommodation~~ **relevant commissioning** service**(s)** ~~and the Council's Children's commissioners, where relevant,~~ will also be consulted as part of the application process, to confirm these details are correct. On the expiration of the temporary period secured through the planning permission, the accommodation should be reverted back to its lawful use as a single family dwellinghouse and any facilitating works removed. **Where residents are eligible for support under the Care Act 2014, these needs should be met via supported and specialist accommodation, and will be considered under Local Plan Policy H6 rather than this policy.**

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																					Given the evolving picture of need for these forms of accommodation, if Newham's ~~Temporary Accommodation~~**relevant commissioning** service ~~and/or relevant commissioners~~ state that these forms of accommodation are no longer needed, planning permission will not be granted for the change of use under this exception clause. For the purposes of H2.4.c, major roads are key arterial routes and local and destination routes that have town centres and local centres situated along them and/or are A roads within the borough.
Reg19-E-021	Watkin Jones		Reg19-E-021/019	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						Blank	Blank						Blank	Co-Living Affordable Housing WJG is supportive of the draft Plan including a co-living policy (Policy H9) and that this is largely reflective of the approach detailed within Policy H16 of the London Plan (2021).		Support noted.

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Reg19-E-021	Watkin Jones		Reg19-E-021/020	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			3.b			Blank	No						Blank	WJ raises objection to points (3b) (4) and (6) of the draft policy as follows. This approach towards PIL is different from that stated within points 9 and 10 of Policy H16 of the London Plan: "9. It delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an: upfront cash in lieu payment to the local authority; or in perpetuity annual payment to the local authority. 10. In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial Intensification, co-location and substitution, to be provided at a discount of 50 per cent or the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications, however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review". The accompanying text states that evidence based which has been used to inform Policy H9 is the Council's SHMA and the Local Plan Viability Report (April 2024) prepared by BNP Paribas. Neither of these documents provide justification or explanation as to why the approach advocated by the draft Policy H9 of the Local Plan is different to the approach detailed in Policy H16 of the London Plan. No further clarity is provided by the justification text on page 238.	In the absence of evidence justifying an alternative approach, and in order to make this policy sound, WJG requests that the Council adopts the approach detailed within Policy H16 of the London Plan.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach in Policy H9 is effective and justified in that it accords with the approach taken in Newham's adopted 2018 Local Plan. In Newham's adopted 2018 Local Plan, Policy H2.d states that "Exceptionally, consider off site provision or payment in lieu where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions/features or local context, (including tenure mix) and provided that it would result in the ability to secure a higher level of affordable housing provision." This position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-021	Watkin Jones		Reg19-E-021/021	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			4			Blank	Blank						Blank	[WJ raises objection to points (3b) (4) and (6) of the draft policy as follows.] <u>Other Matters</u> Policy H9(4) should allow a PTAL level as existing or as planned.		The Council notes the proposed modification. This is not considered necessary for soundness. However the Council understands the reasons for the proposal and considers their inclusion could improve the delivery of the Local Plan objective to deliver homes to meet the diverse needs of our population. Therefore, if they are further proposed by the Inspector, the Council would be supportive of these modifications being made.

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Reg19-E-021	Watkin Jones		Reg19-E-021/022	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			6			Blank	Blank						Blank	[WJ raises objection to points (3b) (4) and (6) of the draft policy as follows.] [Other Matters] Policy H9(6) states: "Main town centre uses or social infrastructure provided within large-scale purpose-built shared living developments are only acceptable in suitable locations and if the facilities are publicly accessible". The policy should make clear that this part of the policy only applies to land uses that are not ancillary to LSPBSL (e.g. shared workspaces and laundries) noting that elsewhere (p237) the Plan recognises: "Large-scale purpose-built shared living: ... Additional services and facilities are often included within these developments such as room cleaning, bed linen, on-site gyms and concierge services."		A change to this policy approach has not been made. We did not consider this change to be necessary as we are satisfied the policy is effective, with ancillary uses forming part of the principal use and being assessed as such through the development management process. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/015	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			H9.1			Blank	Blank						Blank	7) It is recommended that Policy H9 Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living (page 251) that are approved are also required to meet the SBD requirements as per Policy D1. This is to ensure physical measures alongside the proposed Management Plans mentioned in H9.1 (page 253) will ensure the best safety for all users of the development.		A change to this policy approach has not been made. We did not consider this change to be necessary as Policy D1 requires major developments to achieve Secured by Design accreditation for the physical security of buildings (Silver award). The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/033	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			H9.1			Blank	Blank						Blank	[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)] Policy H9: Houses in multiple occupation and large-scale purpose-built shared living page 251 1. Developments for houses in multiple occupation and large-scale purpose-built shared living developments should include a detailed and resourced residential management plan.		Comment noted.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/034	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living					H9.1	Blank	Blank						Blank	[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)] Implementation Policies page 253 Residential management plans should contain: - management practices that minimise safeguarding risks; and - opportunities for residents to create and sustain social networks; and - measures that will minimise the housing's amenity impacts; and - security and fire safety procedures.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/105	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living														No comment.		Comment noted.

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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/005	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						Yes	No						Yes	S&G continue to support the inclusion of the Site under this draft designation. They remain pleased that the draft designation continues to support residential development on the Site through co-location. The Site is situated in a highly accessible and sustainable location, in close proximity to Plaistow Underground Station. It is also surrounded by established residential uses. As such, the Site can support a substantial new mixed use development including residential use (and other quasi-residential uses which contribute towards local housing targets). This can be seen through the new developments coming forward around Plaistow Underground Station and opposite the Site. It has also been confirmed by LBN itself during the S&G's pre-application meetings. Therefore, we encourage the policy to recognise that 'residential uses' should also be construed to mean associated quasi-residential uses, including co-living.		A change to this policy approach has not been made. We did not consider this change to be necessary as the wording of policy J1 is effective and would not preclude the delivery of residential uses on Local Mixed Use Areas, subject to schemes meeting the relevant policy requirements of the plan. In particular, the Employment Land Review sets out that this site should come forward for employment-led development, where development is required to first meet employment needs in any design, and then other uses such as residential can be fitted around it. The wording of the allocation would not preclude housing other than general needs housing being delivered; however, the acceptability of these types of housing on site allocations will be dependent on whether they meet the policy requirements set out in the relevant Local Plan policies. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/010	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living						Yes	No						Yes	Co-Living Draft Policy H9 addresses houses in multiple occupation and LSPBSL/co-living. In terms of co-living, S&G welcomes that the policy continues to largely echo the requirements of the London Plan (2021). Additionally, it is positive to see that the policy's approach to affordable housing continues to support either on site delivery or a payment in lieu contribution towards affordable housing, subject to financial viability testing. This flexibility reflects recent London Plan Guidance and will facilitate LSPBSL scheme's coming forward. Part 6 of draft Policy H9 outlines that "main town centre uses or social infrastructure provided within large-scale purpose-built shared living developments are only acceptable in suitable locations and if the facilities are publicly accessible." The supporting text to the policy identifies suitable locations as "those which are defined as acceptable for Main Town Centre uses under Local Plan Policy HS1, Policy HS3 and social infrastructure under Policy SI2." While this broadly aligns with Policy H16 of the London Plan as co-living developments will generally be located in areas where town centre uses are considered acceptable, the policy should make clearer that these uses can help to meet local needs (i.e. employment needs) locally (as per para 3.1.2 of the LSPBSL LPG). In its current wording, the policy does not align with the London Plan (2021) and LSPBSL LPG and is therefore not sound. It is noted that unlike Policy H16 of the London Plan (2021), draft Policy H9 does not make specific reference to communal facilities and services within co-living schemes, which are an integral feature of co-living developments. Furthermore, the LSPBSL LPG states that "facilities open to the public may count towards resident communal space requirements where they are integrated within the LSPBSL accommodation; managed integrally by the building's manager; and accessible to residents at least 12 hours a day, and at least six days a week". On this basis, it is critical that draft Policy H9 is updated to make specific reference to communal facilities within co-living schemes. It would also be beneficial for the policy to make direct reference to the requirements of London Plan Policy H16, to confirm that LBN is aligned with the GLA in its approach to co-living.		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the current approach is positively prepared, and does not preclude these uses coming forward, provided they do not undermine our justified approach to delivering town centre and employment uses in designated locations. Policy H11 also provides further guidance on how applicants should approach the provision of internal communal spaces for large-scale purpose-built shared living. The Council is satisfied that the plan remains sound without the proposed changes. However, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore made the following wording change, which is included in the modification table: [H9.6 Implementation Text] Suitable locations are those which are defined as acceptable for Main Town Centre uses under Local Plan Policy HS1, Policy HS3 **and Policy J1** and social infrastructure under Policy SI2.

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/33	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living														H9: Houses in multiple occupation and large-scale purpose-built shared living Policy H9 identifies that large houses in multiple occupation (sui generis) or large-scale purpose-built shared living (LSPBSL) developments should be directed to town and local centres or along major roads well connected by public transport. We support this approach, however we would suggest a more general flexibility in terms of the required acceptability 'thresholds' further outlined below.	We would suggest the caveat noting a minimum Public Transport Accessibility Level (PTAL) of 4 is removed, and instead a requirement for a Transport Assessment or other suitable report be provided, ensuring any future LSPBSL is appropriately accessible. Although PTAL is an important factor in measuring the accessibility of an area, it does not consider the walkable amenity facilities within an area reducing the requirement for residents to utilise public transport. Greater flexibility would recognise the merits of different areas and their ability to provide adequate uses for residents – furthermore, schemes that include LSPBSL are likely to also include facilities such as convenience stores, leisure facilities, co-working and entertainment spaces as based on the standard Co-living model.	A change to this policy approach has not been made. We did not consider this change to be necessary as these locations identified in the policy can effectively support these densely occupied forms of development and are most accessible to a range of users. They have better public transport and infrastructure in place to manage large congregations of people, as well as a range of facilities that people need (and can benefit from) in the course of a single trip. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/34	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living			3(a)												With regard to Part 3 (a), we would suggest that the payment in lieu contribution towards affordable housing should match the level of affordable housing provision sought by Policy H3 rather than exceeding this requirement to ensure the viability of LSPBSL. Neighbouring borough's such as LB Tower Hamlets note that, where LSPBSL does not meet affordable requirements, the same affordable housing contributions are applied as they would be to regular C3 housing (i.e. in line with adopted affordable housing policy).	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach in Policy H9 is effective and justified in that it accords with the approach taken in Newham's adopted 2018 Local Plan. In Newham's adopted 2018 Local Plan, Policy H2.d states that "Exceptionally, consider off site provision or payment in lieu where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions/features or local context, (including tenure mix) and provided that it would result in the ability to secure a higher level of affordable housing provision." This position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/35	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living															We would also suggest that, where LSBPSL forms part of a wider, larger development including a high proportion of traditional C3 dwellings, there is an option to provide increased affordable housing within such units thereby reducing the affordable housing contribution required for LSBPSL and ensuring the development as a whole includes a greater proportion of traditional and family sized affordable units.	A change to this policy approach has not been made. We did not consider this change to be necessary as the plan is effective, requiring large-scale purpose-built shared living to deliver affordable housing in accordance with Local Plan Policy H3, where housing is being delivered as part of a wider mix of tenures within the application boundary. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/049	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living														Likewise co-living is an important housing product that is able to house greater numbers of people at higher densities. Again, in the right locations, and with the right design controls in place, this product should be encouraged. It has been found (see attached Knight Frank Co-living Report 2024) [Attachment: The Co-Living Report, Knight Frank, 2024] that co-living houses ordinary people across a wide demographic. Good quality co-living in the right locations is taken up very quickly proving it is a popular housing choice. Policies should more proactively encourage this type of housing.		A change to this policy approach has not been made. We did not consider this change to be necessary as the plan supports the delivery of large-scale purpose-built shared living, subject to developments meeting the requirements of the relevant plan policies that seek to ensure this type of housing is provided in suitable locations, is high-quality and does not undermine the protection of family housing. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/050	Homes	H9 HMOs and Large-Scale Purpose-Built Shared Living														Notably also, the GLA's PBSL Guidance Para 2.2.7 enables the delivery of on-site C3 housing instead of a payment-in-lieu as part of co-living schemes, and this is a key factor for Councils. Encouraging co-living in Newham will lead to an increase in affordable housing provision.		A change to this policy approach has not been made. We did not consider this change to be necessary as Policy H9.3 requires large-scale purpose-built shared living developments to deliver affordable housing in accordance with Local Plan Policy H3, where housing is being delivered as part of a wider mix of tenures within the application boundary. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/072	Neighbourhoods	N13 East Ham	N13.SA3 Former East Ham Gasworks													The NPPF (Paragraph 69) requires the Council have a clear understanding of the land available for housing in the borough and to identify a sufficient supply and mix of sites, considering their availability, suitability, and likely economic viability. The Local Plan should identify a supply of specific, deliverable sites for years one to five of the plan period and specific, developable sites or broad locations for years 6 – 10 and, where possible, for years 11 – 15 of the plan. Savills' analysis of the principal strategic allocations within the current Local Plan (Appendix C Newham Local Plan 2018: Existing Residential Site Allocations) details that of the 29 Strategic Allocations within the 2018 Local Plan incorporating residential development, only 10 sites are either complete or currently under construction. It is also notable of these schemes currently under construction or complete only 2 received planning permission further to the adoption of the Local Plan in November 2018. Appendix C highlights the complexities of land assembly and planning alongside the timescales involved to deliver large residential allocations.		Comment noted. Newham's latest Authority Monitoring Reports set out further information on recent housing delivery in the borough.

Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/087	Neighbourhoods	N13 East Ham	New Site													Particular concern relates to the level of housing proposed, which appears to underestimate the level of housing required as per the London Plan 2021 and NPPF 2023.		The comment you have provided has not resulted in a change. We did not consider this change to be necessary as while Newham is unable to meet its 2021 housing target within the period of the London Plan, our updated Local Plan housing target continues to be based on up-to-date phasing assumptions, which have informed the stepped housing trajectory in the new Local Plan. Critically, Newham's issue with meeting our London Plan target related to the delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34 The approach to site phasing is set out within our Site Allocation and Housing Trajectory methodology note, and provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates. The Council is satisfied that the plan remains sound without the proposed changes. Notwithstanding the above, the Council recognises the importance of ensuring the Plan is justified and effective and therefore has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory: [H1.1] Newham will enable a net increase of between ~~51,425 and 53,784~~**53,194 and 54,976** quality residential units between 2023 and 2038. […] [Policy H1 Justification text] Over the course of our plan period Newham will look to enable the delivery of between ~~51,425 and 53,784~~**53,194 and 54,976** additional new homes. [...] [Table] Delivery Period; Years Annual; Delivery Target Short term; 2023/24 – 2027/28; ~~2,974~~**2,957** Medium term; 2028/29 – 2032/33; ~~3,836~~**3,966** Long term; 2033/34 – 2037/38; ~~3,475~~**3,716**

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/11	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills													Housing Delivery / Quantum of Development Paragraph 60 of the NPPF sets out that a Council's overall aim (with respect to delivering a sufficient housing supply) should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community. Newham's Local Plan (2018) housing target seeks to deliver 43,000 homes between 2018 and 2033. This target has increased in the recently published Regulation 19 Local Plan (2024), whereby Newham will seek to deliver over 50,000 homes across the new plan period once adopted (expected Q4 2025). The Council's Site Allocation and Housing Trajectory Methodology Note (December 2022), which was published as part of the evidence base to the draft Local Plan confirms that the Council is unable to demonstrate a 5 year housing land supply. As it currently stands, the Council accept that they can only demonstrate a 2.69 housing land supply. We therefore consider that it is particularly important for the Council to plan appropriately for the strategic site allocations in terms of housing delivery.		Comment noted. The methodology for draft the plan's site allocations can be found in the Site Allocation and Housing Trajectory Methodology 2024.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/046	Homes			3.172												Paragraph 3.172 explains that the borough will also ensure that delivery of specialist housing does not reduce or limit our ability to deliver general needs housing. It is not clear whether this paragraph would encompass PBSA, notwithstanding we disagree with the premise of this paragraph. The needs of different groups should be considered equally and there should not be prejudice against the delivery of specialist housing. Not every site should be considered for traditional forms of housing as a first priority, and if policies for PBSA and co-living have a geographical dimension to them i.e. requiring them to be in a town centre, close to HEI or transport infrastructure, then of course there is going to be a prevalence of this form of housing in those locations		A change to this policy approach has not been made. We did not consider this change to be necessary as the plan is positively prepared to meet housing needs and justified. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. The policies in the plan support meeting the need for specialist and supported accommodation while ensuring the delivery of these homes does not undermine being able to meet our largest housing needs. The Council is satisfied that the plan remains sound without the proposed changes.