

Examination of Newham Local Plan

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IN2: Inspector's Preliminary Questions to the Council

Introduction

In order to provide clarity and potentially narrow down the focus of the examination, the Council is asked to provide **brief** responses to the following Preliminary Questions about general and procedural matters and the content of the Plan. Where necessary, reference should be made to the main relevant evidence available in the examination library.

References to NPPF are to the version published in December 2023, unless otherwise stated¹.

If consideration of any of my Preliminary Questions leads the Council to conclude that a main modification is needed to make the Plan sound or legally compliant, please set out suggested revised wording using ~~striketrough~~ and underlined text. If relevant, this may be based on the schedule of proposed modifications submitted with the Plan², but should be set out in full in the written response to this note.

A response from the Council is requested by **midday on Tuesday 23 September 2025**.

Representors are not being invited to respond to any of the Preliminary Questions at this stage. In due course, when I have considered the Council responses to my Preliminary Questions, I will publish the Matters, Issues and Questions that will be the focus of the examination. Representors will then be able to submit written responses to the Matters, Issues and Questions that are relevant to their regulation 20 representations.

¹ The transitional arrangements in paragraphs 234 and 235 of the NPPF published in December 2024 and amended in February 2025 mean that I am examining the Plan in the context of the version of the NPPF published in December 2023 and associated planning policy guidance extant on that date.

² SD004.

Local development scheme

PQ1. Was the Plan prepared in accordance with the Council's local development scheme as required by section 19(1) of the 2004 Act?

Public consultation

Section 19(3) of the 2004 Act requires the Council to prepare the local plan in accordance with its statement of community involvement. The Council's Regulation 22 Consultation Statement advises that the consultation carried out during the preparation of the Plan was in accordance with its Statement of Community Involvement 2022³.

PQ2. Were any concerns raised in representations made under regulation 20 that the consultation carried out during the preparation of the Plan failed to comply with the statement of community involvement or any relevant legal requirements?

Equalities

Public authorities are required under section 149 of the Equality Act 2010 to have due regard to the following aims when exercising their functions:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic⁴ and persons who do not share it; and
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

An Equality Impact Assessment was carried out during the preparation of the Plan as part of the Integrated Impact Assessment⁵. This finds that there are policies in the Plan which, while not focussed on people who share protected characteristics, could have significant positive effects including through the provision of a range of housing, employment, green infrastructure, transport and community infrastructure. It concludes that the Plan exhibits due regard to the Council's Public Sector Equality Duty.

PQ3. Were any concerns raised in representations made under regulation 20 that the Plan is likely to adversely affect persons who share relevant protected characteristics as defined in s149 of the Equality Act 2010 or that the Council failed to have due regard to the Public Sector Equality Duty?

³ SD017 section 1.

⁴ Age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

⁵ SD06.

Duty to cooperate

The duty to cooperate under section 33A of the 2004 Act applied during the preparation of the Plan up until it was submitted for examination on 18 July 2025 under regulation 22.

The Duty to Cooperate Statement and Addendum, and associated Statements of Common Ground,⁶ provide information about engagement with local planning authorities and prescribed bodies on strategic matters⁷.

Statements of Common Ground with the Mayor and Thames Water are stated in the list of examination documents “to follow”.

PQ4. Have any local planning authorities or other prescribed bodies made representations under regulation 20, or subsequently in discussions about the duty to cooperate statement of common ground, that claim the duty to cooperate has not been complied with?

PQ5. Why has the Council not yet agreed a Statement of Common Ground with the Mayor and (b) when does the Council expect to submit it?

PQ6. (a) Why has the Council not yet agreed a Statement of Common Ground with the Thames Water and (b) when does the Council expect to submit it?

General conformity with the London Plan

Section 24 of the 2004 Act requires the Plan to be in general conformity with the Mayor of London’s spatial development strategy (London Plan 2021). The GLA’s letter of 30 August 2024 advises that it is the Mayor’s opinion that the Plan is not in general conformity with the London Plan for two reasons, relating to the housing targets and approach to affordable housing.

PQ7. (a) Does the Council accept that the submitted Plan is not in general conformity with the London Plan? (b) If not, why not*, given the Mayor’s opinion?

* In responding to PQ7(b), please refer to relevant principles from:

- (i) any case law relating to the requirement under section 24 of the 2004 Act for local development documents to be in general conformity with a spatial development strategy; and
- (ii) examples of London Borough local plan examination reports published since March 2021 that address the issue of general conformity.

⁶ SD051 to SD067.

⁷ A “strategic matter” is sustainable development or use of land that has or would have a significant impact in at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas [section 33A(4) of the 2004 Act].

Superseded policies

Regulation 8 parts (4) & (5) require that the policies in a local plan must be consistent with the adopted development plan unless the plan being examined contains a policy that is intended to supersede another policy in the adopted development plan and the plan states that fact and identifies the superseded policy.

The Plan does not state which, if any, policies in the existing adopted development plan it intends to supersede.

PQ8. Is it the Council's intention that policies in the Plan supersede policies in the existing adopted development plan? If so, how does the Plan need to be modified to comply with regulation 8?

Climate change

Section 19(1A) of the 2004 Act requires development plan documents (taken as a whole) to include policies designed to secure that the development and use of land in the planning authority's area contributes to the mitigation of, and adaptation to, climate change.

PQ9. Which policies in the Plan are designed to secure that the development and use of land contributes to the mitigation of, and/or adaptation to, climate change?

Strategic priorities

PQ10. Which parts of the Plan identify the Council's strategic priorities for the development and use of land in the Borough as required by section 19(1B) of the 2004 Act?

The nature of the Plan, policies and reasoned justification

A local plan must set out the authority's policies (however expressed) relating to the development and use of land in their area. If to any extent a policy set out in a local plan conflicts with any other statement or information in the document, the conflict must be resolved in favour of the policy⁸. A local plan must contain a reasoned justification of the policies contained in it⁹.

To be effective, therefore, users of the Plan must know which parts of it are "policies" for the purposes of section 17 of the 2004 Act.

Furthermore, local plans should be succinct, focussed, concise, accessible as possible and serve a clear purpose; they should contain policies that are clearly written and unambiguous¹⁰.

⁸ Section 17 of the 2004 Act.

⁹ Regulation 8.

¹⁰ NPPF 15 and 16, and PPG ID: 61-002-20190315.

Supplementary planning documents should build upon and provide more detailed advice or guidance on policies in an adopted local plan¹¹.

Each section of part 1 of the Plan contains some introductory paragraphs followed by policies contained within a coloured box and referenced BFN1 etc. Some of the policy boxes contain a Table setting out detailed information, guidance, requirements, etc (eg policies D4, HS1, J1).

The policy boxes are followed by text beneath a heading “Justification”, sometimes with another heading “Planning Obligations”. That then is followed by a heading “Implementation” and a box with detailed text that seems to relate to / supplement each numbered part of the preceding policy (BFN1.1, BFN1.2, etc).

PQ11. Is the Plan succinct, focussed, concise and accessible as possible?

PQ12. Are any of the following intended to be “policies” for the purposes of section 17 of the 2004 Act?

- (a) Tables including detailed information and guidance within some of the policy boxes?
- (b) The statements under the heading “Planning Obligations”?
- (c) The statements under the heading “Implementation”?

PQ13. If the Implementation boxes are not intended to be policy but contain associated guidance and advice, why are they are not published separately as supplementary planning document(s) rather than included in the Plan?

Part 2 of the Plan contains separate sections for 17 neighbourhoods (N1, N2, etc). Each section contains:

- Introductory paragraphs about, and a map of, the neighbourhood.
- A heading eg N1 North Woolwich, below which is a box with the heading “Vision” and another coloured box without a heading which states “The vision for North Woolwich will be achieved by ...” followed by a numbered list of statements and requirements and a list of “Sites” (N1.SA1, N1.SA2, etc).
- A box for each site with a heading eg N1.SA1 North Woolwich Gateway with factual information (address, site area, heritage designations, existing uses, etc).
- A map of each site with a key showing site boundary and other information relating to design, layout, landscaping and access.
- A box setting out development principles, design principles, infrastructure requirements and information about phasing and implementation.

PQ14. Which parts of each section of part 2 of the Plan are intended to be “policies” for the purposes of section 17 of the 2004 Act?

¹¹ PPG ID: 61-008-20190315.

PQ15. What is the intended purpose of the maps of the site allocations, and how do they relate to the policies map which is required to illustrate geographically the application of policies in the adopted development plan¹²?

Strategic and non-strategic policies

The box on page 14 of the Plan advises that all policies are strategic (other than BFN3, D5, HS6 and T4).

NPPF 17 to 23 and PPG ID-41-076-20190509 are specifically relevant to determining which local plan policies should be defined as “strategic”.

Neighbourhood plans are required to be in general conformity with the Plan’s strategic policies.

PQ16. Do all of the strategic policies in the Plan, including those in part 2 relating to neighbourhoods and allocations, meet the relevant criteria in the NPPF and PPG?

Integrated Impact Assessment

Local plans should be informed throughout their preparation by a sustainability appraisal that demonstrates how the plan has addressed relevant economic, social and environmental objectives. Significant adverse impacts on these objectives should be avoided and, where possible, alternative options which reduce or eliminate such impacts should be pursued¹³.

Local planning authorities are required to consider “reasonable alternatives” during the preparation of local plans, to comply with relevant legislation relating to strategic environmental assessment and to meet one of the tests of soundness¹⁴. The reasonable alternatives should take account of the objectives and geographical scope of the plan¹⁵.

An Integrated Impact Assessment, which includes sustainability appraisal and strategic environmental assessment, was carried out during the preparation of the Plan and a report, including a non-technical summary, was submitted alongside the Plan in July 2025¹⁶

Appendix E of the Integrated Impact Assessment (pages 115-261) describes the reasonable alternatives that were identified and appraised during the preparation of the Plan and explains why the Council considers there were no reasonable alternatives for certain parts of the Plan.

PQ17. Do any representations made under regulation 20 claim that the Integrated Impact Assessment failed to identify reasonable alternatives to the Plan?

¹² Regulation 9.

¹³ NPPF 32.

¹⁴ NPPF 35b and The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).

¹⁵ SEA Regulation 12(2).

¹⁶ SD006.

Appendix E of the Integrated Impact Assessment does not seem to explain why no reasonable alternatives were identified in relation to policy H1 and the Plan's housing targets (which the Mayor considers are not in general conformity with the London Plan).

PQ18. Why were no reasonable alternatives to policy H1 and the Plan's housing targets identified and appraised?

Plan period

NPPF 22 states that strategic policies should look ahead over a minimum 15 year period from adoption.

Strategic policies H1 (meeting housing needs) and J1 (employment and growth) look ahead to 2038. As the Plan is likely to be adopted between 1 April 2026 and 31 March 2027, those strategic policies would look ahead 11 years from adoption.

Paragraph i.10 states that "This Local Plan will be adopted with a shorter than 15 year time period, reflecting the likely need to undertake a further refresh at the 5 year review point to address the new plan making requirements (see below) and updates to the London Plan."

However, all local planning authorities have to review their local plans within 5 years and update them if necessary under current legislation, and all will be subject to the "new plan making requirements". National policy does not indicate that strategic policies in local plans for areas covered by a spatial development strategy do not need to look ahead 15 years from adoption.

PQ19. What is the Newham-specific justification for policies H1 and J1 (and other strategic policies in the Plan) not looking ahead over a minimum 15 year period from adoption contrary to national planning policy?

Housing requirement

NPPF 67 states that strategic policy-making authorities should establish a housing requirement figure for their whole area.

Policy H1 in the Plan states that Newham will enable a net increase of between 51,425 and 53,784 homes between 2023 and 2038.

The annual delivery targets in the Table following paragraph 3.174 add up to a total of 51,425 homes.

PQ20. (a) Does policy H1 need to be modified to clarify what the Plan's minimum housing requirement is? (b) What is the purpose of referring to a range of between 51,425 and 53,784 homes?

Housing requirement 2023 to 2029

London Plan policy H1 part A states that Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for and that Boroughs must include these targets in their development plan documents. Table 4.1 includes a ten year target (2019 to 2029) of 32,800 homes for Newham and 21,540 for the London Legacy Development Corporation (part of which is in the Borough).

Paragraph 3.169 in the Plan advises that the relevant London Plan target for 2019 to 2029 is 47,600 homes (including 14,800 in the part of the Borough that was in the London Legacy Development Corporation).

The Table following paragraph 3.174 includes an annual target of 2,974 homes between 2023 and 2028, and 3,836 homes between 2028 and 2033. In other words, a target of 18,706 for the period 2023 to 2029.¹⁷ This compares to a London Plan target for that six year period of 28,560 based on an annual average target of 4,760. In other words, a shortfall of 9,854 homes.

Table 9 in the Site Allocations and Housing Trajectory Methodology Note 2025 [EB058] indicates that a total of 11,646 homes were completed in the Borough between 2019 and 2023. This compares to a London Plan target for that four year period of 19,040 based on an annual average of 4,760. In other words, a shortfall of 7,394 homes.

In total, therefore, the Plan's housing requirement for the period 2023 to 2029 (18,706) would result in a shortfall of 17,248 homes¹⁸ compared to the London Plan target taking into account the shortfall in completions between 2019 and 2023.

In other words, policy H1 sets a target that would result in around 64% of the London Plan target for the period 2019 to 2029 being delivered in that period¹⁹.

PQ21. Does the Plan's housing target for the period 2023 to 2029 (18,706 homes) represent a shortfall of 17,248 homes against the London Plan target for 2019 to 2029 (47,600 homes) when account is taken of completions 2019 to 2023 (11,646)?

Housing target for 2029 to 2038

London Plan paragraph 4.1.11 indicates that if a target is needed beyond the 10 year period (2019 to 2029) it should be based on the GLA 2017 SHLAA, any local evidence of capacity, additional capacity that could be delivered as a result of committed transport improvements, and rolling forward the small site capacity assumptions in the London Plan.

The annual targets in the table following paragraph 3.174 add up to a total of 32,719 homes for the period 9 year period 2029 to 2038²⁰.

¹⁷ $2,974 \times 5 = 14,870$. $14,870 + 3,836 = 18,706$.

¹⁸ $7,394 + 9,854 = 17,248$.

¹⁹ $17,248 = 36\%$ of 47,600.

²⁰ $3,836 \times 4 = 15,344$. $3,475 \times 5 = 17,375$. $15,344 + 17,375 = 32,719$.

PQ22. Is the Plan's housing target for the remainder of the plan period after 2029 a minimum of 32,719 homes (up to 2038)?

Housing supply in the submitted Plan

Paragraph 3.174 explains that the housing target range in policy H1 (51,425 to 53,784 homes) is capacity derived. Policy H1 indicates that the housing requirement will be met through (a) the majority of new homes being on site allocations; (b) optimisation of housing delivery on small sites (<0.25 hectares); and (c) windfalls.

However, the Plan does not seem to identify how many homes it assumes will be provided through each of those sources of supply. Nor does the Plan include a housing trajectory illustrating the expected rate of housing delivery over the plan period as referred to in NPPF 75.

The Implementation box following policy H1 advises that Newham will aim to deliver 3,800 homes on small sites (<0.25 hectares) as set out in London Plan policy H2.

Part 2 of the Plan includes all of the allocations in each of the 17 neighbourhoods. However, the allocation policies and reasoned justification do not include figures for the number of dwellings proposed or assumed on each site.

PQ23. In total, how many net additional homes does the submitted Plan assume will be completed during the plan period on:

- (a) allocations
- (b) small sites
- (c) windfalls
- (d) any other sources?

PQ24. (a) Does the submitted Plan allocate every site that the Council's evidence indicates is suitable and available for development? (b) Does the submitted Plan assume that the number of homes built on the allocations will be optimised and contain policies aimed at achieving that (taking account of constraints and other policies including relating to industrial land, environmental assets etc)? (c) What does the Council's evidence for the submitted Plan indicate the indicative capacity (net additional homes) to be for each allocation (ie the capacities that collectively contribute to the overall target of 51,425 to 53,784 homes)?

Housing supply – EB058 and proposed modification to policy H1

The Council has proposed a modification to the Plan to increase the range to between 53,194 and 54,976 units "to reflect the updated housing trajectory". The updated housing trajectory seems to be summarised in the Site Allocation and Housing Trajectory Methodology Note 2025 [EB058] Table 11 which contains those figures.

EB058 Table 11 indicates that a total of 54,976 net additional homes will be completed in the plan period 2023 to 2038.

PQ25. In total, how many net additional homes does EB058 assume will be completed during the plan period on:
(a) allocations
(b) small sites
(c) windfalls
(d) any other sources?

PQ26. What does the evidence now available in EB058 indicate the indicative capacity (net additional homes) to be for each allocation in the Plan?

Housing supply information update

The latest available evidence relating to housing land supply seems to be set out in EB058. This seems to include information about completions up to 31 March 2023, and trajectories looking forward from that date.

PQ27. (a) When does the Council expect to publish the next comprehensive housing land supply information (to update that in EB058)? (b) Will that report completions up to 31 March 2024, or 2025? (c) Will it contain comprehensive information on planning permissions as at 1 April 2024, or 2025?

Five years following adoption

NPPF 69 states that planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption (with an appropriate buffer, as set out in paragraph 77).

It seems reasonable to assume that the Plan will be adopted between 1 April 2026 and 31 March 2027.

PQ28. Does the Council agree that the relevant period for the purposes of examining whether the Plan identifies a supply of specific, deliverable sites for five years following the intended date of adoption is 1 April 2027 to 31 March 2032?

Five year requirement following adoption

The annual targets in the table following paragraph 3.174 indicate a requirement for a total of 18,318 homes between 2027 and 2032²¹.

National guidance extant in December 2023 refers to a buffer of 10% being applied to the five year requirement for the purposes of plan-making, or 20% where the Housing Delivery Test indicates delivery has fallen below 85% of the requirement²². NPPF December 2023 paragraph 77 and footnote 43, and current NPPF, also refer to a 20% if there has been a significant shortfall in delivery.

²¹ $2,974 + (4 \times 3,836) = 15,344 = 18,318$.

²² PPG ID: 68-010-20190722.

PQ29. For the purposes of examining whether the Plan identifies a supply of specific, deliverable sites for five years following the intended date of adoption, is the relevant requirement, including a 20% buffer, 21,982 homes²³?

Five year supply following adoption

The submitted Plan does not seem to identify a supply of specific, deliverable sites for five years following the intended date of adoption.

PQ30. Based on the housing target of 51,435 to 53,784 homes, the phased delivery set out in the Table below paragraph 3.174, and the evidence for those figures, what is the capacity of specific, deliverable sites for the period 1 April 2027 to 31 March 2032?

Table 11 in the Site Allocation and Housing Trajectory Methodology Note [EB058] includes the following projected completions for the five years following adoption:

- 2027/28 – 3,858
- 2028/29 – 4,836
- 2029/30 – 4,765
- 2030/31 – 4,069
- 2031/32 – 3,453

The above figures add up to a total of 20,981 homes for the period 2027 to 2032.

PQ31. (a) Does the updated housing trajectory in EB058 indicate a supply of specific, deliverable sites with capacity for 20,981 homes in the period 1 April 2027 to 31 March 2032? (b) Do those figures reflect the most up-to-date available evidence relating to housing land supply for the purposes of examining the Plan?

Gypsies and Travellers

National policy expects local planning authorities to use a robust evidence base to establish accommodation needs for travellers to inform the preparation of local plans. Plans should set pitch targets and identify a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against those targets, and identify a supply of specific, developable sites or broad locations for years 6 to 10 and, where possible, for years 11-15²⁴.

The latest available evidence seems to be the Gypsy and Traveller Accommodation Assessment (ORS, May 2022)²⁵. That evidence indicates that there is one traveller site in Newham which is publicly owned and identifies a need for a total of 23 pitches. Most of that need is associated with families living on the existing site (concealed/doubled up households, children who will require their own accommodation within 5 years, and projected household growth), along with some families living on the roadside and some in bricks and mortar housing. 15 of the

²³ 18,318 x 120% = 21,982

²⁴ PPTS paragraphs 7, 9 and 10.

²⁵ EB057.

pitches were expected to be needed by 2027, a further 2 by 2032, with the remaining 6 by 2038.

The 2022 GTAA used the definition of Gypsy and Traveller from the PPTS published in 2015. The definition was updated in revised PPTS published in 2023, and again in revised PPTS published in 2024. The definition now includes persons of nomadic habit of life ... who have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan.

NPPF expects evidence to be up to date. The Procedure Guide for Local Plan Examinations advises that evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older.

Paragraph 3.195 in the Plan states that the latest evidence found a need for 23 pitches in the borough. It also refers to emerging evidence of need being led by the GLA which will consider the need for pitches across London.

Policy H10 in the Plan states that the designated Gypsy and Traveller site is safeguarded, and that developments that propose accommodation including those for new sites and pitches will be supported where they meet identified need (and certain criteria are met). The Plan does not seem to identify any specific deliverable or developable sites for traveller accommodation. Paragraph 3.194 states that “We will seek to meet the need identified through our local plan and the emerging regional evidence base through the Council’s Small Sites Options Appraisals and Modular construction programme”.

PQ32. (a) Is the Plan supported by robust, up to date evidence about the need for traveller accommodation? (b) Is the assessment of need in the available evidence relevant to the PPTS 2024 definition of Gypsy and Traveller?

PQ33. When will the emerging evidence of need across London being led by the GLA be available?

PQ34. What is the justification for the Plan not identifying a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites, or a supply of specific, developable sites or broad locations for years 6 to 10 and 11-15?

PQ35. What is meant by “we will meet the need identified ... through the Council’s Small Sites Options Appraisals and Modular construction programme”?

PQ36. Have any additional pitches been created or granted planning permission in the Borough since the GTAA was carried out?

Retail and leisure floorspace requirements and supply

Paragraph 3.1 in the Plan refers to a need for 25,973 sqm of retail floorspace. Policy BFN1 part 4 states that retail and leisure needs will be met by:

- (a) Directing main town centre uses to existing metropolitan, major, district and local town centres.
- (b) creating a new district centre on allocation N17.SA1 Beckton Riverside.
- (c) creating new local centres on 5 specified allocations.
- (d) expanding three specified local centres.
- (e) protecting and expanding the network of neighbourhood parades.

PQ37. What is the quantified need for additional leisure floorspace in the plan period?

PQ38. What quantities of (i) retail and (ii) leisure floorspace does the Plan assume will be provided over the plan period in each of the categories (a) to (e) in policy BFN1 part 4?

Office and industrial floorspace requirements and supply

Paragraph 3.1 and policy J1 refer to a need to deliver 90,000 sqm of office floorspace and 335,000 sqm of industrial floorspace over the plan period to 2038.

Table 11 in the Plan identifies a “total pipeline supply” of 636,270 sqm of office floorspace – an oversupply of 546,270 sqm against the need referred to in policy J1.

Table 12 in the Plan identifies a total “gross supply” of industrial floorspace of 471,265 sqm – an oversupply of 136,937 sqm against the need referred to in policy J1. The supply comprises:

- 23,820 sqm on sites with permission
- 95,500 sqm on sites with “industrial potential in planning”
- 351,945 sqm on sites with potential for intensification

Paragraph 3.156 states that the pipeline of industrial land supply is not sufficient to meet need, nor are the sites with industrial potential currently in planning. Therefore, to meet this economic demand and enable employment growth, the policy requires there to be no further release of industrial land and for industrial development to take the form of intensification to deliver further industrial floorspace.

Policy J2 part 1 states that all developments on Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs) must intensify site use to deliver a net increase in industrial floorspace through the most appropriate intensification format.

Policy J2 part 3 supports developments for new employment floorspace outside SIL and LIL and other locations identified in policy J1 provided that 3 criteria are met. Implementation J2.2 refers to co-location on specific site allocations outside any SIL and LIL designations being supported in the form of mixed use or employment led development and lists relevant site allocations.

PQ39. (a) Is each of the sites with “industrial potential in planning” identified? (b) How is each site with “industrial potential in planning” allocated / designated in the Plan?

PQ40. How much industrial floorspace is assumed to be accommodated on each of the site allocations listed in J2.2?

Appendix 9: Glossary

PQ41. Are all of the definitions in the Plan’s Glossary (Appendix 1) consistent with national planning policy (including Annex 2 to NPPF February 2025)? If not, what is the justification?

William Fieldhouse

8 September 2025
